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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES
3 CASE NO: C 420153
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5 *****
6 CHURCH OF SCIENTOLOGY OF *
7 CALIFORNIA, A CALIFORNIA *
8 CORPORATION *
9 VS. *
10 GERALD ARMSTRONG, ET AL., *
11 *****
12 AND RELATED CROSS-ACTION *
13 *****
14
15 DEPOSITION OF GERALD ARMSTRONG,
16 taken pursuant to Notice under the Mass. Rules
17 of Civil Procedure, before Ruth Day-Rabadjija,
18 a Notary Public and Certified Shorthand
19 Reporter in and for the Commonwealth of
20 Massachusetts at the offices of Geller &
21 Wineberg, 80 Boylston Street, Boston,
22 Massachusetts, on Wednesday, October 29, 1986,
23 commencing at 10:15 a.m.
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A P P E A R A N C E S:

Flynn, Joyce & Sheriden
(BY: MICHAEL TABB, ESQ.)
400 Atlantic Avenue
Boston, Massachusetts 02210

On behalf of the Plaintiff

Geller & Wineberg
(BY: ERICK BLUMENSON, ESQ. and ROGER GELLAR,
ESQ.)
80 Boylston Street
Boston, Massachusetts 02116

On behalf of the Defendant

ALSO PRESENT:

Jim Auger
Ken Long

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I N D E X

<u>Witness</u>	<u>Direct</u>
Gerald Armstrong	3

E X H I B I T S

<u>No.</u>	<u>Description</u>	<u>Page</u>
1	One page from the document of Gerald Armstrong's history containing: Organizations belonged to, Drug History, and Medical History	

P R O C E E D I N G S

Stipulation

It is stipulated by and between counsel for the respective parties that the deposition is to be read and signed and filed; that the sealing thereof is waived; and that all objections, except as to form and privilege, are reserved for the Court.

GERALD ARMSTRONG

a witness called for examination by counsel for the Defendant, being first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. BLUMENSON:

Q. Okay. Would you state your name, please.

A. Gerald Armstrong.

Q. And where do you live?

MR. TABB: We are not going to provide that information at this time. I don't think it is relevant. If the court deems it not privilege, we will give it to you.

Q. Do you still live in the Boston area?

A. Yes.

1 Q. Do you still live in Cambridge?

2 A. Yes.

3 Q. Do you think that the Church of
4 Scientology or any agents of the Church know
5 where you live currently?

6 A. I figure it's 90/10 that they do.
7 It's a likelihood.

8 Q. Do you have any evidence that they do?

9 A. Yes.

10 Q. Have you been contacted by a member of
11 the Church or an agent of the Church at your
12 present address?

13 A. I do not know if I have or have not.

14 Q. Okay. Have you seen a member of the
15 Church or an agent of the Church at your
16 address?

17 A. I do not know if I have seen one or
18 not.

19 Q. Okay. And when did you move into your
20 present residence?

21 A. At least a couple of months ago.

22 Q. Okay. That's your best estimate, "a
23 couple of months ago"?

24 A. Yes.

1 Q. Now, have you brought any materials in
2 response to the subpoena duces tecum?

3 MR. TABB: Mr. Blumenson, this is our
4 response to the subpoena. It is addressed to
5 Mr. Peterson, because he was the person who
6 provided the affidavit. Basically, it says
7 that the document that requested the subpoena
8 is the same was that served on the document or
9 production request on the Plaintiff, which he
10 responded to and that the same documents would
11 be produced and the same objections would be
12 made.

13 MR. BLUMENSON: I will review this
14 during a break.

15 Q. And then you have produced L. Ron's
16 journal?

17 A. I don't know that that was produced.
18 I just saw that when Mike pulled that out right
19 now.

20 MR. BLUMENSON: That was not part of
21 the production originally?

22 THE WITNESS: No.

23 MR. BLUMENSON: Do you want it back?

24 MR. TABB: If you want it, you can

1 have it.

2 THE WITNESS: I don't know how it
3 appeared here.

4 MR. BLUMENSON: Well, we will hold on
5 to it and see if we can answer that question.

6 THE WITNESS: All right.

7 MR. TABB: I understand at least a
8 statement portion was the same that was
9 produced in California.

10 Q. Is there any reason why you can't give
11 the whole truth today in response to my
12 questions that you are aware of?

13 A. Well, you and I have discussed this at
14 some length before, and I hesitate to get into
15 the same, you know, discussion of logic and
16 whether or not, you know, we are talking about
17 truth from the perspective of John Peterson or
18 the truth from the perspective of Gerald
19 Armstrong, or whether or not it is the whole
20 truth. I have no recollection of -- I mean,
21 nothing comes to mind of my not having told
22 what I later considered to be something
23 different from the truth. So I have got a
24 pretty good track record on it, and I will

1 definitely give it my best shot today.

2 Q. Okay. But you have some uncertainty
3 as to whether you will be able to give the
4 whole truth today apparently; is that a fair
5 statement?

6 A. That is a little misconstrued of what
7 I have been attempting to say.

8 Q. I just want to understand it.

9 A. What I mean is that, you know, we got
10 into this discussion before about relative
11 truth and about Hubbardian truth, and I know
12 that is the avenue that you are going down.
13 And I will say what I have been saying, and I
14 will give it my best shot. I have no intent to
15 tell -- I have nothing in my mind that I am
16 contemplating telling you anything other than
17 my perception of reality. How does that answer
18 that?

19 Q. Well, it doesn't fully answer it,
20 because I don't really fully understand it. So
21 let me ask you do you know of any reason why
22 something you say might not be the truth today?

23 A. Well, I think that that is a
24 translation of the negative that I just gave

1 you. I see no reason.

2 Q. But you are not fully confident that
3 everything you say is going to be the truth?

4 A. No. You are misconstruing -- you are
5 totally misinterpreting what I have been saying.
6 I am trying to give you as absolutely and
7 positively an answer as I humanly can.

8 Q. You mean as complete an answer to my
9 question right now?

10 A. Yes. I mean, you --

11 Q. And I appreciate that.

12 A. She swore me in, and I know it says, "The
13 whole truth and nothing but the truth so help
14 you God." Now, I don't care how you slice it,
15 if you want to get in that sort of a pattern,
16 which people go through, right, and I have been
17 through it now sworn dozens of times.

18 Q. Right.

19 A. Okay. So it has --

20 Q. I am just asking about today though.

21 A. Right. But it has a certain meaning
22 to it, but when you start to delve into it, you
23 get into, you know, cosmological, philosophic
24 issues. I mean, search back to your original

1 question about whether or not today I have to
2 get into a projection of what could today
3 possibly have to which I could not answer
4 anything but the instantaneous, spontaneous
5 truth.

6 Q. Okay. In other words, the question is
7 not a simple one and requires some elaboration
8 as to whether you intend to tell the truth
9 today?

10 MR. TABB: I believe Mr. Armstrong
11 made it clear that he does intend to tell the
12 truth; he has no reason to lie.

13 MR. BLUMENSON: I will strike the
14 question. I think it's apparent on the record,
15 but I do think we have a ground rule here,
16 which is that the witness gives the answers and
17 not the attorney. So I object to your
18 injecting what was not in the record as your
19 preferred answer, Mr. Tabb. Be that as it may,
20 we will move on.

21 Q. Are you under the influence of any
22 medication today?

23 A. No.

24 Q. Have you had any medication in the

1 last 48 hours?

2 A. No.

3 Q. No drinks?

4 A. No.

5 Q. And are you presently married?

6 A. No.

7 Q. You are divorced?

8 A. Yes.

9 Q. And do you live with anybody presently?

10 MR. TABB: I don't understand the
11 relevance of the question, Mr. Blumenson.

12 MR. BLUMENSON: I am simply asking for
13 his present circumstances. I am not asking for
14 identities as yet. I am asking him whether he
15 lives alone or if he lives with people.

16 MR. TABB: Answer the question, Gerry.

17 A. Sir, when you say, am I living with
18 someone, you mean, is there someone within the
19 same confines of that apartment or house --

20 Q. Exactly.

21 A. -- who also sleeps there?

22 Q. Exactly.

23 A. Correct, I do.

24 Q. And how many people fit that

1 description?

2 A. One.

3 Q. And who is that person?

4 MR. TABB: We are not going to answer.

5 We are going to object to the identification of
6 the individual.

7 Q. How long have you been living with
8 this individual?

9 A. I'd say something over a couple of
10 months or around a couple of months, whatever I
11 said before.

12 Q. Is this person a male or female?

13 A. The person is a female.

14 Q. And do you have any kind of romantic
15 relationship with this person?

16 A. I would have to get your
17 classification of romantic relationship.

18 Q. Would you describe yourself as lovers?

19 A. No.

20 Q. There is no sexual element to your
21 relationship?

22 A. She's female and I am male, but that's
23 it. We are not lovers. I think that answers
24 it.

1 Q. Right, that answers it. And have you
2 ever been lovers with this individual?

3 A. We are not and never have been.

4 Q. Okay. And is this person someone who
5 has ever been in the Church of Scientology?

6 A. I don't believe so. When you say, "in,"
7 you mean a staff member?

8 Q. Well, or a believer?

9 A. A believer?

10 Q. Yes.

11 A. I'd say, no.

12 Q. Is this person familiar with the
13 Church of Scientology in any way other than
14 what you have told the individual?

15 A. Not that I know about.

16 Q. You have had discussions about your
17 scientological past or anti-scientological
18 present?

19 A. Some.

20 Q. And she is familiar with your lawsuits,
21 for example --

22 A. No.

23 Q. -- or the lawsuit?

24 A. No, she isn't.

1 Q. Does she know that you have been a
2 defendant and a plaintiff?

3 A. Correct.

4 Q. And does she know any information
5 concerning the subject matter of either of
6 those lawsuits?

7 A. I don't believe so.

8 Q. Have you talked with her about your
9 experiences with L. Ron Hubbard?

10 A. I don't believe so.

11 Q. Or Michael Flynn?

12 A. You mean, like, I went to work today?

13 Q. Okay. Sure.

14 A. Yes, that sort of thing.

15 Q. Who pays for the rent on this
16 apartment?

17 A. I do and she does.

18 Q. You split it 50/50?

19 A. It's not quite that way. I probably
20 pay a lot more than she does.

21 Q. Because you are more able to pay than
22 she is?

23 A. Sort of, you know, it's hard to get --
24 actually, to get -- I think so, yes.

1 Q. Any other reason?

2 A. No.

3 Q. How did you meet this individual?

4 A. Through a friend.

5 Q. And who is that friend?

6 A. I can't tell you.

7 Q. Does that friend have anything to do
8 with scientology?

9 A. No.

10 Q. Is this individual Sarah Knowles?

11 A. No.

12 Q. Have you ever lived with Sarah Knowles?

13 A. Sarah Knowles?

14 Q. Well, do you know Sarah Knowles?

15 A. Yes. No, I never lived with Sarah
16 Knowles. Sarah came to her house, but, you
17 know, about that.

18 Q. No, I don't. Sarah came to your house?

19 A. To her house. You know, I was -- you
20 have it somewhere. I was taking care of her
21 house and so just occasionally she would come
22 there.

23 Q. But you are no longer taking care of
24 her house?

1 A. Correct.

2 Q. Who buys the household supplies for
3 your household?

4 A. It sort of depends, you know. We kind
5 of share things and don't share things, so it
6 kind of depends on who is out doing things.

7 Q. Would you describe yourself as friends
8 with this individual?

9 A. Yes.

10 Q. You like each other?

11 A. Yes, sure.

12 Q. Do you ever have social activities
13 together?

14 A. Yes.

15 Q. Such as what?

16 A. Such as -- let me think. Movies.

17 I've gone to some movies, that's mainly --

18 Q. Do you go out to dinner ever?

19 A. I think maybe, maybe early on we did
20 once or twice.

21 Q. Do you think you can rely on this
22 person to help you when you are in difficulty
23 or need an ear to talk to?

24 A. Well, you know, that is a difficult

1 question. I think in a broad way, I mean, she
2 seems honest and capable and intelligent, and
3 so I suppose, you know. But as far as, you
4 know, can I unburden myself to her, no, I don't --
5 it's not possible.

6 Q. Are you available for her to tell you
7 her problems?

8 A. Oh, yes, I am available with everyone.

9 Q. And have you given her guidance or
10 counseling of any kind when she has been upset?

11 A. No. I don't think I have ever seen
12 her upset.

13 Q. Has she seen you upset?

14 A. Yes, I think so. Yes.

15 Q. When was that, do you recall?

16 A. I think there was a period right after
17 the P.C. Folder Culler, I think, that she would
18 have picked up that I was freaked out, flipped
19 out.

20 Q. How would she have picked that up?

21 A. From, you know, from the -- definitely
22 from the way I was acting.

23 Q. Do you recall a specific conversation
24 you had with her about the P.C. Folder Culler?

1 A. Oh, yes, I think I talked to her about
2 it.

3 Q. What did you tell her?

4 A. I don't know. What are you going to
5 say?

6 Q. Do you remember the date, roughly,
7 that this was?

8 A. No. It would have been back -- when
9 did I get that stuff? Sometime in July. It
10 probably would have been July or August.

11 Q. And do you recall any other occasion
12 when she might have perceived you to be upset?

13 A. Oh, I think, you know, a few times,
14 yes.

15 Q. Well, tell me the other occasions?

16 A. You know, I can't tell you --

17 Q. Well, other than the P.C. Culling
18 incident that you described, can you remember
19 any other particular day or date that she would
20 have observed you as upset?

21 A. She would have picked it up a lot.
22 She knows what the situation -- she knows that
23 I am involved with scientology. She knows what
24 I have told her about the -- yes -- about the

1 way I act, and about the way, you know, the
2 locking of the doors, and being --

3 Q. I'm sorry, I missed that last part.

4 A. Right, I know.

5 Q. "She knows about the doors," did you
6 say?

7 A. You know, the way I am. You know, if
8 you are with me for five seconds you know that.

9 Q. Was there an incident involving a
10 locked door?

11 A. There is the way I deal with the
12 subject of security and being followed and the
13 knowledge of what are the parameters of
14 possibility of the fact of being connected with
15 me and being involved and that sort of thing,
16 and the way that I act. You know, you travel
17 down the road with me and you know that it's
18 just different.

19 Q. Okay. But tell me what you are
20 referring to with regard to the locked doors.

21 A. I mean, a lot. I flip between fear
22 and whatever else there is in life.

23 Q. Can you tell me what you are referring
24 to about the locked door.

1 A. About the subject of security and the
2 necessity to lock doors. You don't leave doors --

3 Q. Unlocked?

4 A. Unlocked. You are aware of those
5 sorts of things.

6 Q. Tell me, in this apartment, is this a
7 two-bedroom apartment?

8 A. No. I have got the couch.

9 Q. You are in the living room?

10 A. Yes.

11 Q. And so there is no door to the living
12 room, but there is an exterior door; is that
13 correct?

14 A. A what?

15 Q. There is no door to the living room,
16 but there is an exterior door to the house or
17 apartment?

18 A. Correct.

19 Q. And the exterior door has a lock on it,
20 which you keep locked, correct?

21 A. Yes.

22 Q. And are there any other locked doors
23 within the apartment?

24 A. Rear door.

1 Q. Okay. And have you discussed locking
2 the exterior doors with your roommate?

3 A. Yes.

4 Q. And you said that you like them locked,
5 am I right? I'm just trying to get into the
6 facts of this.

7 A. Well, yes.

8 Q. Has she ever left the front door
9 unlocked?

10 A. Yes, I think, early on.

11 Q. This is in an urban setting, right?

12 A. Yes. I mean -- but you can go through
13 them with credit cards.

14 Q. Okay. So how many locks are on this
15 door?

16 A. I think, three.

17 MR. TABB: Mr. Blumenson, I think you
18 are getting a little far afield. There is a --

19 MR. BLUMENSON: Mr. Tabb, let me just --

20 MR. TABB: There is an outline and a
21 court order about what we are going to cover
22 here and, granted, Mr. Armstrong made a remark
23 about locked doors and security, and you are
24 taking this into minutiae. We are going to be

1 here along time anyway, so why don't we
2 concentrate on things that are a little more
3 important about whether Mr. Armstrong has some
4 phobias about locked doors or how many locks
5 his apartment has on it. In the grand scope of
6 things in what we have got to cover I just
7 don't see where this adds up. If we spend this
8 kind of detail on everything, Erick, we are
9 going to be here for a long, long, long, long
10 time and you are going to be here alone because
11 we are going to go to Judge Breckenridge and
12 say that this has gone way off the path.

13 MR. BLUMENSON: Well, listen, Mike,
14 that is completely your privilege, and what I
15 am going to endeavor to do to the best of my
16 ability is to simply ask questions which I
17 consider relevant and we will let the court
18 decide. You have your option of refusing to
19 permit an answer, if you think it's in
20 violation of form or privilege. I believe
21 under the rules, you don't have the right to
22 refuse an answer on grounds of relevance
23 because that is for the Judge to decide later
24 on, it is reserved for trial. What I am

1 suggesting is I think in the past some of these
2 depositions in scientology litigation have been
3 unnecessarily combative and painful to all of
4 the people in the room, I don't think anybody
5 would disagree with that, and so what I am
6 going to try to had is avoid colloquies and
7 simply request that if you feel that you have
8 some grounds to refuse to answer a question on
9 form or privilege that you make it clear on the
10 record without, you know, speech making, and I
11 will endeavor to do the same. I realize I have
12 made speeches in the past too. I am just going
13 to say that I think it is very relevant to this
14 case.

15 MR. TABB: Let me just state my
16 position here and I will put it the record now
17 and, hopefully, I won't have to repeat myself.
18 There was a request that you are aware of
19 before Judge Breckenridge to limit the time of
20 this deposition and he denied that request. He
21 however give us the right to break the
22 deposition any time when we felt we were going
23 far
24 afield. At this moment, I think you are going

1 afield. I am trying not to keep the deposition
2 combative and everyone has kept their tones low,
3 which may be a record for a Gerry Armstrong
4 deposition.

5 If you want to keep asking questions
6 like this, fine. Mr. Armstrong is not going to
7 object, but if you keep dealing into minutiae,
8 Mr. Blumenson, we are simply just not going to
9 show up until the Judge rules on this, because
10 he has had this time and he has gone into
11 minutiae, when he could have had valid
12 deposition time, and we will just go to Judge
13 Breckenridge.

14 MR. BLUMENSON: Well, we are
15 forewarned that I am incurring a risk and if I
16 were to do that in my judgment this is very
17 relevant and calculated to lead to admissible
18 evidence, and if we disagree, we will just
19 leave it to the judge without rancor, all right?

20 MR. TABB: Fine.

21 Q. Did you install any locks yourself or
22 have them installed on the exterior doors?

23 A. No.

24 Q. Okay. When you rented the apartment

1 they were there?

2 A. Right.

3 Q. And are any of them police locks?

4 A. Well, a couple of them are dead bolts.

5 I guess, that will pass, right?

6 Q. Yes. And have there been any

7 break-ins

8 in that apartment?

9 A. None that I know of.

10 Q. Okay. Have you on this incident
11 involving what you called your P.C. Cullings,
12 how did you become aware that this occurred in
13 July or August of this year?

14 A. My recollection is that I became aware
15 of it sometime prior to the actual receipt of
16 the materials. I believe that it was just a
17 statement, and I do not have it -- I have not
18 received it-- either a verbal statement or
19 something written by John Peterson, which
20 stated, you know, the organization has gone
21 through this contorted mind boggling logic to
22 justify, you know, the culling of these P.C.
23 Files and he sort of touched on that at some
24 point, and when he made the statement that they

1 show that Armstrong is some kind of a, you know,
2 depraved or debauched or immoral, you know,
3 just some kind of a despicable individual and
4 that was sometime prior to the actual filing of
5 the code product from the P.C. Files.

6 Q. Okay. And when you say, "the code --

7 A. And the code products that was filed
8 in front of -- with the judge and, I guess, it
9 was given to Julia, and Julia sent it out to me.
10 So I saw it some days after the filing of it.

11 Q. Now, on the declaration, you are
12 referring to, was in response to an order by
13 Judge Breckenridge concerning the production of
14 the P.C. Files, was it not?

15 A. An order?

16 Q. Was there an order to produce?

17 A. It was entitled an objection.

18 Q. An objection to the production?

19 A. Just so that we know what
20 classification of document it was.

21 Q. Okay.

22 A. There was an order to produce and, I
23 believe, the original date of that was July 2,
24 1985, and then the organization appealed that,

1 they lost at the appellate court level, and
2 they went up to the California Supreme Court
3 level and they lost that. So then it came back
4 down and they delayed and stonewalled another
5 several months. And then finally it was
6 ordered, and they went passed several orders
7 beyond that, and their final last shot was to
8 cull the folders, in fact, miscull them,
9 because a large number of the incidents, the
10 more bizarre of the incidents never happened,
11 there is some either past-life fantasies, or
12 they are out of the whole cloth mind of Donald
13 Randolph, Peterson, and whoever else was
14 involved in the culling of these things.

15 Q. So you can't say that the contents of
16 that declaration that you referred to is
17 actually recitation of what is in the P.C.
18 Files as opposed to the fancies of Don Randolph
19 the attorney?

20 MR. TABB: I don't understand your
21 question.

22 A. Could you read back my answer and see
23 whether or not -- I think we have taken care of
24 that.

1 Q. Well, I just want to know whether I am
2 fairly duplicating what you told me.

3 A. No. You distorted it.

4 Q. Didn't you say that the declaration
5 contained things that you hadn't -- or is it
6 fair to infer from what you said that the
7 declaration that was filed contains statements
8 which you never said in auditing?

9 A. Do you mean that that is the totality
10 of it?

11 Q. Let's start with that.

12 A. There were approximately three or four
13 pages of line-by-line statements, supposed
14 statements, with their own distorted
15 interpretation of them. So they are not
16 exactly quotes, because they are written from
17 another person and the twist that is given to
18 them is the standard scientological twist.
19 However, of that three or four pages, several --
20 and you will find that word back there -- are
21 not, in fact, incidents which really happened.
22 So not only did they cull the files, I mean,
23 not only did they do the ultimate mind block
24 there, but they added to these and culled these,

1 in fact, admissions against interests after I
2 had filed several declarations in which I
3 claimed I do not waive the privilege.

4 Q. Okay. But is it fair to say, that you
5 and your attorneys were seeking to have these
6 P.C. Files produced for possible use in your
7 trial; is that true or false?

8 A. Possible use in what way? How are you
9 construing "possible use"?

10 Q. Well, did you want these produced for
11 some evidentiary purpose?

12 A. Take, for example, the fact of them, how
13 are you going to show -- "Mr. Armstrong, you
14 have been saying all along you have had 1,000
15 to 1,500 hours of auditing, prove it." "I
16 don't even have my documents." "Oh, how
17 interesting." So they have evidentiary use,
18 but not the violation of the statements, I mean,
19 that is so bizarre. It is so contorted. It is
20 so perverse it boggles the mind. It is almost
21 impossible to comprehend it and talk about it.

22 Q. Was one of the reasons that you sought
23 to have these produced, so that you might be
24 able to use the contents of the P.C. Files in

1 evidence at your trial?

2 MR. TABB: I am going to object, Mr.
3 Blumenson, as to what Mr. Armstrong's defense
4 is going to be and how he is going to use
5 material that is work product.

6 MR. BLUMENSON: I am not asking --

7 MR. TABB: My objection is on the
8 record. MR. GELLER: Mr. Tabb, I
9 think you misspoke, you said, "his defense."

10 MR. TABB: Well, whatever his action,
11 how he is going to frame his suit. How we are
12 going to use documents and why we requested
13 documents is the attorney's work product.

14 MR. BLUMENSON: Well, there is an
15 attack here that the Church is using these P.C.
16 Files, which, for evidentry purposes, and I am
17 trying to find out --

18 MR. TABB: The attack is that Mr.
19 Peterson put a gratuitous affidavit in front of
20 the court, which distorted the material that is
21 in the P.C. Files for no reason, but to smear
22 Mr. Armstrong.

23 A. The thing was signed by Randolph and
24 it was labeled an objection.

1 Q. Okay. And was one of the things that
2 it was filed under seal, do you know that? Was
3 it filed under seal?

4 A. Yes.

5 Q. So that it would only be available to
6 the court and not to the public generally,
7 correct?

8 A. Oh, no. I think it will be available
9 to the public generally.

10 Q. Well, at the time it hasn't been
11 available to the public yet, has it?

12 A. I have no idea. I think it is waiting
13 in the wings.

14 Q. But when it was filed and to this date
15 it was filed as a sealed document for the court
16 only to review, correct, am I correct?

17 A. Well, that's the thing that is on the
18 front of it.

19 Q. Right. And you have no evidence that
20 anyone other than the court and yourself and
21 your attorneys have seen this document?

22 A. Yes.

23 Q. Correct?

24 A. Yes, I have.

1 Q. You have evidence that people other
2 than the parties to this lawsuit and the judge
3 have seen this document?

4 A. Yes.

5 Q. Who?

6 A. Donald Randolph.

7 Q. Well, he is an attorney for one of the
8 parties?

9 A. How interesting.

10 Q. I mean, I am asking, isn't he?

11 A. Ken Long has seen it.

12 Q. I am asking other than the parties and
13 their attorneys, has this information of this
14 declaration been disseminated outside of the
15 parties, their attorneys, and the judge, to
16 your knowledge?

17 A. Not to my knowledge.

18 Q. Do you intend to rely on this
19 declaration as part of your claim of emotional
20 distress?

21 A. When you say, "declaration," are you
22 referring --

23 Q. Or Don Peterson or Don Randolph that
24 you just referred to; is that correct?

1 MR. TABB: That is a legal question,
2 Mr. Blumenson.

3 Q. You are saying it caused you emotional
4 distress, correct?

5 A. Absolutely.

6 Q. Okay. And is it fair to say that the
7 P.C. Files were produced on your motion?

8 A. I have not yet received them. I don't
9 know what has been taken out of them. I don't
10 know what has been put in them, so I cannot say
11 that, no.

12 Q. Is it fair to say that the position of
13 the two parties was from the Church that these
14 should not be produced and they are privileged
15 and the position of your side was that they
16 should be produced?

17 MR. TABB: And are still privileged.

18 Q. Is it fair to say that?

19 A. No, that is not fair.

20 Q. Okay. Why were you upset, by the way,
21 when you learned of the so called "Culling"?

22 A. It was the ultimate act. I thought,
23 you know, I had seen a lot of things. I had
24 gone through just twisted, contorted, the whole

1 video tape thing. And it was -- like, it was
2 just mind bending.

3 Q. Did it upset you to know that people
4 had read your P.C. Files? I am just asking for
5 the record to get your answer.

6 A. For the record right now, yes. Yes,
7 it upsets me that anyone -- it upsets me that
8 L. Ron Hubbard ever looked at my P.C. Folders.
9 It upsets me that I ever got involved in
10 auditing. The whole concept of P.C. Folders is
11 just incredibly mind bogglingly upsetting.

12 Q. I am just asking you though, was the
13 reason that you were upset at the so-called "Culling"
14 in August or September that people had read
15 your P.C. Folders?

16 A. Wait a minute. I don't know how you
17 are construing that. I have said that the fact
18 that people reading them upset me, but that was
19 not the totality of the reason, because they
20 have gone beyond the reading of them.

21 Q. And that is by filing the sealed
22 declaration with the court?

23 A. Oh, come on, it is blackmail. It is
24 blackmail on its face.

1 Q. Why is it?

2 A. If Armstrong even looks -- if
3 Armstrong gets his preclear -- this is almost
4 verbatim quote, if Armstrong gets his preclear
5 folders, the Church will be forced to utilize
6 these. Who is forcing whom? It is like if I
7 even look at them -- they have done what they
8 have done.

9 Q. Well, wait a second, Gerry.

10 A. Well, wait a second. They have done
11 what they have done for so many years to me, I
12 mean, it defies the imagination. And now,
13 that's the next logical step. When they filed
14 declarations saying, you know, by their own
15 religious experts, saying that comparing the
16 scientological sanctity of the preclear folders
17 with that of the Catholic confessional and
18 saying that the priests or those other
19 ministers were going to the guillotine rather
20 than divulge that information. Nobody was
21 forcing them. I was pleading. I mean, I wrote
22 declarations saying, "I don't waive it, please."
23 "No," wham, "no"
24 (indicating).

1 Q. You have sued and said that
2 scientology auditing was a fraud that did you
3 no good, right, in part?

4 A. That's pretty accurate.

5 Q. And do you believe that you have a
6 right to use these auditing files to attempt to
7 prove that your auditing was unsuccessful?

8 A. I don't know the contemplation of the
9 use of the auditing files at this time, but I
10 certainly do -- I mean, I clearly see as
11 difficult as it is for me to grapple with and
12 to proceed with, I clearly see the use of the
13 preclear folders in the demonstration of their
14 violation.

15 Q. Well, let me ask you, how else would
16 the Church be able to dispute your claim that
17 auditing was unsuccessful other than by going
18 into what the contents of the auditing and
19 results of the auditing were?

20 A. Well, I think --

21 Q. Is there any other way they could do
22 it?

23 MR. TABB: This is a speculative
24 question that calls for Mr. Armstrong to

1 present the Church's defense.

2 MR. BLUMENSON: Well, I am asking if
3 there is any other way by --

4 MR. TABB: This is the sort of thing
5 that --

6 A. I can answer the question. Give it to
7 me again.

8 Q. Is there any other way or do you think
9 that the evidence of what's in these auditing
10 files is relevant to the issue of what kind of
11 information was obtained in auditing and
12 whether it helped or harmed you?

13 A. Well, certainly what type of
14 information was obtained in auditing and that
15 it was used to harm me, I would say, absolutely.

16 Q. Okay. And if the claims that you say
17 are in the auditing file are disputed by the
18 Church, do you think the Church has a right to
19 show what is really in the auditing file or not?
20 If there is a disagreement as to what these
21 things mean within the auditing file, does the
22 Church have a right to present the same
23 evidence you are presenting, namely, the files?

24 A. So what you are saying, lets say, I

1 say, that you took from those files Statement X,
2 right, I am saying that.

3 Q. Right.

4 A. So you get to use the files to go in
5 and say, "No, we took Statement Y," you can use
6 them for that purpose.

7 Q. What about if we want to say that
8 Statement X isn't in it files?

9 A. That is nuts.

10 Q. What if we say that Statement X is not
11 in the files, and you say that Statement X is?

12 A. You have already taken Statement X out
13 of the files. I have a list of what you have
14 taken, your admissions that they were culled
15 from the files, right, I don't have to. It is
16 your filing.

17 Q. Let me just ask you one other question.

18 A. What else do I need?

19 Q. Let me just ask you one other question
20 and leave this. This complaint that you have
21 or grievance that you have about the so-called
22 "culling" all arose in the context of an issue
23 as to whether an issue of your motion to
24 produce these files; isn't that true?

1 A. No.

2 Q. The declaration was in response to
3 your motion to produce the file; is that true?

4 A. No, no.

5 Q. Was it in the context of the
6 litigation over whether the files should be
7 produced?

8 A. You are talking about this objection?

9 Q. Yes. Was it in the context of the
10 litigation over your motion as to whether the
11 file should be produced?

12 A. No. The nearest that I can tell, as
13 far as how the document arose, was that someone
14 got it in their mind that possibly -- because
15 you have been saying, "Peterson has got it in
16 declaration after declaration. Armstrong is
17 psychotic; he is a mad man. Maybe we can drive
18 him over the edge, because we can put this
19 stuff out, twist it, contort it, make it so
20 abhorrent, put it in front of him -- imagine,
21 put that twisted contorted version in front of
22 the guy who can most effect this case, the
23 trial, and my life. You don't think that that
24 is classic third-party, classic propaganda,

1 classic abhorrent attack.

2 Q. You yourself have filed all sorts of
3 affidavits that say that you know that L. Ron
4 Hubbard attempted suicide, correct?

5 A. I have never said that.

6 Q. You haven't?

7 A. What?

8 Q. That L. Ron Hubbard attempted suicide?

9 A. Did I ever say that?

10 Q. I thought you did, and correct me if I
11 am wrong.

12 A. In what declaration?

13 Q. Well, let me ask you another question
14 then, have you put in declarations that said
15 that L. Ron Hubbard was a fraud?

16 A. Yes.

17 Q. Have you put in declarations that say
18 that he doesn't have the degree that he claims
19 to have?

20 A. Yes.

21 Q. Have you put in declarations that he
22 is not a war hero?

23 A. Yes. What does that have to do with
24 the culling of preclear folders?

1 Q. Well, it has to do with the character
2 assassination that you claim to be a victim of.

3 A. I think that there is a whole large
4 difference and it probably begins with money.
5 You see, I never ripped L. Ron Hubbard off for
6 hundreds of millions of dollars, that's the big
7 difference.

8 Q. Did he rip you off of hundreds of
9 millions of dollars?

10 A. Well, so far it's going on 18 years.

11 Q. How much have you contributed to the
12 Church apart from labor how much money?

13 A. 1,000 bucks.

14 Q. That is over 18 years?

15 A. I don't know, maybe.

16 Q. Is that your best estimate?

17 A. You mean directly, courses that I took,
18 and that sort?

19 Q. Yes.

20 A. Probably a couple of thousands.

21 Q. That is over the 18 years you referred
22 to?

23 A. But you will see the actual
24 amount in terms of the amount of auditing or
whatever that I had at the going rate, you

1 would probably find half a million dollars.

2 Q. Half a million dollars, because of the
3 amount of auditing you had?

4 A. Right. So if you want to say --

5 Q. How many hours of auditing did you
6 have, roughly?

7 A. I don't know. 1,000, 1,500.

8 Q. Did you pay for that?

9 A. Some of it I paid for directly. Some
10 of it I paid for with -- you know, when you
11 talk about paying for it, in that you get down
12 to the ultimate use to which it is put, I mean,
13 it is the classic --

14 Q. I asked you simply how much money or
15 goods you contributed to the Church as opposed
16 to labor and your statement is that your best
17 guess is about \$2,000?

18 A. I would probably say, 2,000 cash.

19 Q. And then you say, in addition, there
20 was auditing, which you didn't pay for, correct,
21 you didn't pay money for auditing, correct?

22 A. Well, you mean while I was in the C
23 Organization?

24 Q. Right.

1 A. That's more or less correct. Again,
2 if you understand that you really do pay.

3 Q. The auditing was valued in the
4 thousands or hundreds of thousands?

5 A. Yes.

6 Q. And you received that as service or at
7 the time you thought it was services you were
8 receiving from the Church?

9 A. Yes. At the time, I mean, there
10 wasn't any choice.

11 Q. Well, didn't you actively seek to have
12 auditing on several occasions?

13 A. Well, you know, if you were to get
14 into the ultimate total number of hours that --
15 I mean, I was in the R.P.F., it was compulsory.
16 There was no way out.

17 Q. You actually did opt out of auditing
18 in the R.P.F. and refuse to have some?

19 A. What time period are you talking about?

20 Q. I think, '76 or '77. Didn't you say
21 that you didn't want to have auditing in the
22 R.P.F.?

23 A. To whom, do you recall?

24 Q. No. I am asking you whether you did

1 or not, that's all.

2 A. In the R.P.F. --

3 Q. Let me change the question and make it
4 easier. Isn't it fair to say that at various
5 times or at least at one time you said you
6 didn't want to have auditing?

7 A. There was a time --

8 Q. I just want a yes or no. It is a
9 simple yes or no question.

10 A. Well, I was going to give you -- now,
11 it's not quite that simple as I don't -- Okay.
12 The time that we are talking about which I
13 believe that you are into is a time when I was
14 in the G.O., at Daytona or shortly thereafter,
15 because I got --

16 Q. Let me withdraw the question because I
17 don't want to waste unnecessary time today.
18 All I wanted was a yes or no answer as to
19 whether you asked if you or requested that you
20 not have auditing. And we can go into the
21 reasons or any additional facts relating to
22 that, either in further questions of mine or
23 counter questions by your counsel.

24 A. Then I am not able to go into it

1 really.

2 Q. You can't tell me whether you declined
3 to have auditing?

4 A. I never said, "I declined," but there
5 was a time when, yes, I said, -- I don't even
6 recall exactly what the words were, but it was
7 following either when I was in the G.O., or
8 following the time I was in the G.O., and it
9 was to Jan Norton and it had to do with the
10 fact that all of this shit is going to the G.O.,
11 and I just know it, and I don't want it.

12 Q. Okay. And that was 1975?

13 A. I think it was, yes, the fall of '75.

14 Q. And how long did you go without
15 auditing after that?

16 A. Maybe the beginning of '76, I forget.
17 It was only briefly, I guess.

18 Q. Okay. In fact, in 1979 and '80, when
19 you were working on the biography project or
20 when you petitioned for the biography project
21 was that around
22 '79?

23 A. '80.

24 Q. '80. And one of the things that was

1 purported compensation was that you would
2 receive auditing, correct?

3 A. Who, what, where?

4 Q. I am just asking you wasn't auditing
5 one of the things that you received in
6 compensation for your work on the biography
7 project?

8 A. I guess, for being in the C.
9 Organization. It was not specifically --

10 Q. Did you have auditing at that time?

11 A. Did I in 1980?

12 Q. Right.

13 A. Something like that, I did, yes. OT3.

14 Q. And that was the level at which you
15 quit, OT3?

16 A. Yes.

17 Q. And so apart from the time that you --
18 from late '75 or early '76, when you didn't
19 want to have auditing, you had auditing fairly
20 consistently from the beginning as your being a
21 scientologist in 1981?

22 A. Yes. I would say that only toward the
23 end of '81 did I -- did the whole thing just
24 came unraveled, you know, because up until then

1 I still probably had this efficacy of the
2 technology thing on the brain that you get, you
3 know, which you cannot question, up to -- and
4 once you do, that is it.

5 Q. And the reason in 1975 that you asked
6 not to have auditing was because you felt that
7 the auditing material was not confidential, but
8 was going to the G.O.; is that correct?

9 A. I guess there were a lot of reasons.
10 That was a real --

11 Q. Was that one of the reasons?

12 A. Yes. She assured me right on the spot.

13 Q. But in 1975 the reason you said, "No,"
14 was because you believed auditing was being
15 transmitted to third persons, correct, auditing
16 material?

17 A. Yes. I had a clue by then.

18 Q. Okay. And then, I believe, your
19 testimony in other depositions is that this
20 became apparent to you again in '76 and '77 and
21 onward, right, that it was being communicated
22 to third persons?

23 A. Well, certainly that the G.O.,
24 actually performed this act and had myself and

1 others in the R.P.F., doing it for them, yes.

2 Q. Okay. And in those years from '75 to '81,
3 you continued to take auditing, correct?

4 A. Yes.

5 Q. Okay. And throughout that period or
6 at various times in that period, you yourself
7 were looking through auditing files, that's
8 your testimony, other people's auditing files,
9 correct?

10 A. Definitely in the R.P.F., yes.

11 Q. Did you author Ron's journal, dated
12 September 30, 1984?

13 A. Isn't his name on it?

14 Q. Do you know who authored it?

15 A. I don't know. It says, "L. Ron
16 Hubbard," but you never know. They put on all
17 sorts of things.

18 Q. How did it get in your possession?

19 A. I have no idea how it got here. I
20 don't. It came into the office, and I don't
21 know how it came in. I have seen it around in
22 the last few days.

23 Q. Okay. Was there any information that
24 when you were upset in 1986 that your file had

1 been culled, was there any information that you
2 believed had not been known by the Defendant
3 prior to 1986? I mean, did you think that they
4 had received new information? You said that
5 one of the things that upset you was the
6 culling in 1986. Did you believe they had
7 received new information from those files in
8 1986?

9 A. I think we are talking about something
10 illogical, right, right? I mean, aside from --

11 Q. I just want an answer to my question.
12 I know what you have in mind, but what I am
13 asking you is, did you think in 1986 that new
14 material had been obtained through culling in
15 your files?

16 A. Well, there was the new material,
17 which was the fabrication of Randolph and
18 Company. I don't know who the individuals were,
19 but their organization personnel who fabricated
20 some of it, the new twist, the ultimate
21 conclusion that Gerald Armstrong is some kind
22 of a pathetic, warped individual, I mean, that
23 is a whole new twist to this thing, you know,
24 because it is just -- there is no way it is the

1 truth.

2 Q. Okay. Let me ask you a couple of more
3 questions, does your roommate work?

4 A. Yes.

5 Q. And what kind of work does she do?

6 A. I think the type of work is irrelevant.

7 Q. Well, I am not asking you whether she
8 works, I am just asking you what her job title
9 is?

10 A. She does various things.

11 Q. Is she employed by an organization?

12 A. I think at some times. I can't give
13 you a specific answer to that.

14 Q. Have you shown her your writings?

15 A. I think she has seen some of them.

16 Q. Has she seen your art work?

17 A. When you say -- I believe she's seen
18 some of it. I mean, I drew it right as it
19 comes off of the assembly line and sometimes
20 she sees it.

21 Q. And does she know in what way you were
22 damaged or in any kind of an emotional distress?

23 A. I would not classify her as a
24 psychiatrist or psychologist to be able to

1 arrive at that conclusion, however --

2 Q. She's able to observe your emotional
3 distress?

4 A. Well, I think, again, as I have said,
5 there have been times when it's gotten to me
6 and you see a different kind of animal, and
7 then there is just the fact of being with me
8 and the way that I operate in the real world.
9 And that alone, I think, she would probably
10 perceive as different from the norm.

11 Q. And has she seen you cry?

12 A. I believe so.

13 Q. Has she seen you complain about
14 scientology or heard you complain about
15 scientology?

16 A. Well, I'm not sure about complain. I
17 guess so, I mean, there have been times when I
18 have felt like -- it gets, you know, now is a
19 particularly intense period, when I figured
20 like that is it.

21 Q. She's aware?

22 A. There is no other option that they
23 have other than to kill me.

24 Q. Have you told her that?

1 A. I think, well, either that or
2 something like that.

3 Q. Okay. How old is she?

4 A. I'm not sure. I have never asked her.

5 Q. Has she been surveiled or harassed, to
6 your knowledge?

7 A. Not to my knowledge.

8 Q. What would be the best approximation
9 of her age from your observation?

10 A. I think, 40s.

11 Q. Have you told her to beware of
12 surveillance and harassment?

13 A. I don't think I have ever used "beware
14 of harassment."

15 Q. Have you used words to that effect?

16 A. Well, like I say, I am always -- and
17 no one gets close to me. And I am always aware
18 of it.

19 Q. Have you told her that you have got to
20 be aware that there may be harassment or
21 surveillance or assaults or any words of that
22 nature?

23 A. No. I have generally told her,
24 because of the amount of danger that she is in

1 has come up, because you can't live with Gerald
2 Armstrong for too long without realizing that
3 he is involved with something that is just
4 potentially a little heavy. So --

5 Q. Well, how does she know that?

6 A. What?

7 Q. How does she know that, you say, you
8 can't live with Gerald Armstrong without
9 knowing that he is involved in something heavy,
10 how does she know that?

11 A. Because in regular conversation. Let
12 me see. "You are how old? Where are you from?
13 What did you do?" You are pretty -- within
14 three questions you are into 18 years of my
15 experiential track, which is a big chunk. How
16 do you explain it? And as soon as you get into
17 it, even minimizing it, right, so she asks
18 about danger and about physical danger and,
19 generally I say, "My perception is that it is
20 highly unlikely. I cannot imagine them in
21 their most bizarre imaginations except to, you
22 know, just piss me off. I can't imagine them
23 doing anything physical. So I don't think you
24 are in any physical danger at all. I can't

1 believe that at this time that they are going
2 to do anything at the house. So however, if
3 did it becomes an issue to you and you begin to
4 think about it a lot and dwell on it, I will
5 move on."

6 Q. So you are telling her she needn't be
7 concerned, but if she does get concerned you
8 will go elsewhere?

9 A. Yes. It's happened before. Other
10 people -- I have not got places to stay,
11 because when people are interviewing you and
12 you are going through your track, and you say what
13 you do now and what you have been doing the
14 last several years, and you have got a lawsuit
15 with these guys, you know. "Sorry. Are we
16 going to become involved?" "Yes. They will
17 probably want to take your depositions." "Try
18 somewhere else."

19 Q. Have you lied to your roommate at all?

20 A. Not that I know of.

21 Q. Okay. Who are the landlords or
22 roommates that turned you down on the basis
23 that you were involved in litigation with
24 scientology?

1 A. I could probably dig them up, but this
2 was February or March of this year. And, you
3 know, I never kept any record of these places,
4 but I could dig it up.

5 Q. Well, in February or March what
6 happened?

7 A. I had to move. I was moving.

8 Q. Were you living somewhere and then
9 kicked out because of scientology litigation?

10 A. No. I was trying to get in some place
11 to stay.

12 Q. Get into some place?

13 A. Correct. It was an issue.

14 Q. What was the address of the place?

15 A. I could probably take you there.

16 Q. Was it in Cambridge?

17 A. No. It was in Bellmont.

18 Q. And you had an interview with somebody
19 that you didn't know previously?

20 A. Yes. There were three people who
21 lived there and they needed a fourth, and we
22 all sat around, you know.

23 Q. Yes. I have been through it myself.

24 A. You know, in a roommate situation

1 that's how the game works. And they interview
2 a dozen people. And they said -- you know, one
3 guy was emphatic enough to talk the rest of the
4 group out of it.

5 Q. Were you there when he talked the rest
6 of the group out of it?

7 A. Yes.

8 Q. What did he say exactly?

9 A. When he learned of that, he said, "No
10 way."

11 Q. When he learned of what, what had you
12 just told him?

13 A. That I was involved as a litigant with
14 the scientology organization.

15 Q. Had you told them that you were going
16 to be killed?

17 A. No.

18 Q. Had you told him that he could expect
19 surveillance or harassment?

20 A. Well, what I would tell someone, if
21 they asked --

22 Q. No. I am asking you about this
23 particular case, did you tell him that?

24 A. Well, I can't -- no, no. Because you

1 understand even what I have told people that I
2 am living with, I mean, that's what I tell them.
3 The possibility is there. Everything is in the
4 realm of possibility. Would I be more
5 concerned about the nuclear situation than a
6 hit from the scientologists, yes. My life is
7 something else, because people who are kind of
8 tangentially connected to Gerald Armstrong --
9 the organization is not so awesome that it can
10 get them all. Right?

11 Q. Has it gotten any of them, anybody
12 connected with you, because of by virtue of the
13 fact that they are connected to you?

14 A. Well, I think that people are harassed
15 in the legal process of this whole thing.

16 Q. Let me ask you since you have moved to
17 Boston, is there anybody who has been connected
18 to you whose been harassed by scientology that
19 you can name by virtue of the fact that they
20 are connected with you? I know you consider
21 every plaintiff in scientology is harassed, so
22 I am putting aside people who are in litigation
23 with scientology, and just other people that
24 you know, have any of them suffered harassment

1 in Boston?

2 A. I would think that there is any, you
3 know -- (conferring with counsel).

4 Just so we are clear, Mike said, "Sarah
5 Knowles," and I thought of Sarah Knowles, but
6 Sarah Knowles, I mean, although there has been
7 the attempt in this case to take her deposition,
8 she, herself, I mean, hopefully, there is no
9 reason why Sarah Knowles should be -- it was,
10 whatever you do with commissions in the
11 beginning it was ended, right, it was denied.
12 So I don't consider as long as Sarah Knowles
13 doesn't know about it, she has in the past, I
14 mean, you guys even filed something indicating
15 that you got communication of Sarah Knowles
16 relative to her financial advisor, Jeff white,
17 so in the past --

18 Q. You are saying that apart from, well,
19 you are saying that you do not consider that
20 Sarah Knowles has been harassed, to your
21 knowledge?

22 A. Well, relative to this lawsuit,
23 nothing that I know.

24 Q. Okay.

1 A. Like I say, there have been things
2 which I know about or have heard about from
3 prior to my arrival here, the organization
4 vis-a-vis Sarah Knowles.

5 MR. BLUMENSON: I want to state for
6 the record that I asked Mr. Armstrong a
7 question as to who has been harassed by his
8 virtue of their connection to him. And I think
9 the record is very clear that before there was
10 an answer, Michael Tabb whispered to Gerald
11 Armstrong, the deponent, Sarah Knowles, very
12 explicitly feeding him an answer which he
13 avowed.

14 MR. TABB: You have got three people
15 around you feeding you questions.

16 MR. BLUMENSON: I am not the deponent,
17 Mike.

18 MR. TABB: I am just trying to refresh
19 Mr. Armstrong's memory. He disavowed to take
20 my suggestion. It is still his testimony. If
21 he declines not to take my suggestion, he is
22 entitled to it.

23 MR. BLUMENSON: I want to simply and
24 without rancor --

1 MR. TABB: This is the sort of thing,
2 Mr. Blumenson, that we don't need to put on the
3 record, and it is only going to cause bad blood,
4 so why don't we get on with the deposition.

5 MR. BLUMENSON: I think the reason it
6 has to be on the record is because it is
7 totally out of place when I ask the witness a
8 question for you to whisper the answer to him.
9 And I think he honestly gave his answer, which
10 disavowed what you were telling him.

11 MR. TABB: I am not giving Mr.
12 Armstrong answers, I merely --

13 MR. BLUMENSON: Why did you say Sarah
14 Knowles?

15 MR. TABB: Because I was suggesting
16 things to him that might have escaped his
17 memory, which is still logical. Mr. Armstrong
18 still has and is completely independent of me
19 as he has demonstrated in many of his
20 depositions, he uses his own mind himself to
21 take whatever suggestions I make and whatever
22 suggestions I make to him are privileged which
23 he did in this case and give his answer under
24 oath the way he wishes to. I am not giving Mr.

1 Armstrong answers and I resent the implication
2 that I am. If I make a suggestion to Mr.
3 Armstrong, he is free to take it and what I say
4 to him and when I say it to him is my business,
5 Mr. Blumenson and not yours.

6 MR. BLUMENSON: There is no need for
7 raising voices, but I am making this point,
8 which I think is a fair one and simply request
9 that it not happen again and I am not impugning
10 Mr. Armstrong's integrity in anyway. What I am
11 saying is that it is out of place for you to
12 whisper an answer to Gerry because you think
13 that he should give it. I think that is just
14 completely --

15 MR. TABB: Your objection is noted,
16 Mr. Blumenson.

17 THE WITNESS: I want to take a break.

18 MR. BLUMENSON: Can we make it five
19 minutes?

20 THE WITNESS: Can we make what five
21 minutes?

22 MR. BLUMENSON: The break.

23 THE WITNESS: I guess so.

24 (Brief break)

1 Q. As to the present place you live, are
2 there any other security precautions that you
3 have taken other than the locks?

4 A. Wait a minute.

5 Q. Are there any other security
6 precautions that you have taken?

7 A. Wait a minute. You don't mean the
8 installation, do you, we went through this
9 before, right?

10 Q. I know you didn't install locks, but I
11 know you locked them, okay, other than that are
12 there any other security precautions in the
13 house?

14 A. No. I think that once I am inside,
15 you know -- I mean, I don't go in front of
16 opened windows with the light to my back.

17 Q. What floor are you on, are you on the
18 first floor or a higher floor?

19 A. I don't know if the floor I am on --

20 Q. Well, are you on the ground level or
21 are you on a higher level?

22 A. Yes.

23 Q. You are on the ground level?

24 A. No. I am on the higher level. On the

1 floor, you don't need to nail it down like that.

2 Q. Well, I am pretty specific.

3 A. For what?

4 Q. Well, for example, if you are on the
5 first floor there might or might not be grills
6 on the window?

7 A. Okay. There are no grills on the
8 window.

9 Q. And no other security precautions that
10 you can think of?

11 A. You mean, I am inside. I come in.

12 Q. You lock the door?

13 A. I lock the door. I don't go in front
14 of windows.

15 Q. Is there anything else?

16 A. I check -- I always taste the Visine
17 before I put it in my eye.

18 Q. That is a joke, right?

19 A. No. It's the truth. I check, you
20 know, I sometimes do set things up so I will
21 know if they have been tampered with.

22 Q. Have you ever discovered anything
23 tampered with?

24 A. Well, yes. I found my trunk has been

1 burglarized and a manuscript stolen from it.

2 Q. When was that?

3 A. November 9, 1984.

4 Q. My question is have you taken any
5 other security precautions in the house that
6 you are living in now that is with this present
7 roommate which is since August?

8 A. Yes. There is nothing else that comes
9 to mind.

10 Q. Other than locking the doors?

11 A. Right. You know, I mean --

12 Q. And did you --

13 A. I taste drinks.

14 Q. Okay.

15 A. You know. It's hard to -- if I were
16 to go through my ritual that I go through on a
17 daily basis, I suppose I could come up with
18 some things that are definitely a different
19 perception or action in the world than what I
20 had before I became acutely aware of the
21 existence of an organization dedicated to
22 harming me.

23 Q. You mentioned that this P.C.
24 Declaration, or so called "culling," contained

1 past life fantasies, do you remember that
2 testimony a few minutes ago?

3 A. No. I think you distorted my
4 testimony, and I don't recall talking about
5 that.

6 Q. Did it contain past-life fantasies or
7 not?

8 A. Well, I gave you a couple of
9 opportunities, there are incidents there, which
10 never occurred, which no way occurred in Gerald
11 Armstrong's life, this one here, this lifetime,
12 did not occur. They either came from --
13 because I do not have my preclear folders with
14 which to cross-check what they have called from
15 them -- they either came from --

16 Q. Hold on let me interrupt for a second.

17 A. -- some past-life fantasy, which who
18 knows about, or they are created out of whole
19 cloth by Donald Randolph and Company.

20 Q. Well, first, let's set the record
21 straight, your lawyer does have the P.C.
22 Folders, right?

23 A. Who?

24 Q. Julia Dragojevic.

1 A. What Julia has is various copies which
2 no one to my knowledge has examined yet to
3 confirm whether or not they are indeed the
4 preclear folders.

5 Q. But you are in an opportunity now to
6 see if the things in this letter are in the
7 folder, correct, are the copies that you have?

8 A. No. Because I, as yet, do not have
9 the preclear folders.

10 Q. Now, when you say they are either Don
11 Randolph's just made up language, or they are
12 past-life fantasies, when you say that, might
13 they have been past-life fantasies that you had
14 and communicated in auditing; is that what you
15 mean?

16 A. Whose other past-life fantasies are we
17 talking about?

18 Q. That's all I am trying to establish.
19 You are talking about your own past-life
20 fantasy and not Don Randolph's?

21 A. Correct. Well, in either case, you
22 know, if Randolph -- Randolph does not but a
23 qualifier in front of this thing, "by the way,
24 Judge Breckenridge this one here is a past-life

1 incident." No. He puts in front of Judge
2 Breckenridge all of these things culled, as if
3 this is the Gerald Armstrong that we are
4 talking about, the one, don't you know, this is
5 it. So regardless of which way it was, it
6 either through a demonstration of his ignorance
7 of the whole auditing process and where he was
8 on the time track at that incident, at that
9 instant, or whether or not, for some other
10 reason he just threw in something because he
11 thought, "Hey, I can get away with this. Let's
12 pick whatever we can find, or let's invent some
13 juiciness."

14 Q. You say, because of his possible
15 ignorance of the time track in auditing, you
16 are saying that he might not be aware that
17 things that you may have said were from
18 past-lives, this is that what you mean by his
19 ignorance of the time track?

20 A. Well, not -- his ignorance of the
21 whole process, maybe.

22 Q. Well, do you mean ignorance of
23 past-life, or does that include ignorance of
24 past-life?

1 A. Ignorance of past-life?

2 Q. Yes. You are staying that he may be
3 ignorant of the past-life, when you say Don
4 Randolph's ignorant?

5 A. No, I am --

6 Q. Okay.

7 A. I am talking about Donald Randolph
8 sees something and decides to cull it, but he
9 don't know what he is culling. He don't know
10 what lifetime or eon, what epoch, or what
11 period in existence. He doesn't know. Why?
12 Because he is ignorant. Why is he ignorant?
13 Because his lust for the blood of Gerald
14 Armstrong blinds him to reality.

15 Q. So some of the things he may have seen
16 in there were renditions you gave were what you
17 thought were of your past-lives, correct?

18 A. There is nothing in these incidents
19 that I am talking about that ever happened.

20 Q. I understand.

21 A. Okay.

22 Q. But at the time --

23 A. I don't have the preclear folders.

24 Q. Right. Let me try to cut through some

1 of the confusion.

2 MR. TABB: I think that you have asked
3 the question three or four times, Erick.

4 Q. At the time that you were doing the
5 auditing and a believer in scientological
6 auditing, you would communicate what you
7 thought were experiences from your past-lives,
8 right?

9 A. Well, you know, you get into the area
10 of belief and you have to ascertain whether or
11 not you you have predicated that on truth.

12 Q. No, no.

13 A. In scientology, Hubbard says, "There
14 is no such thing as belief. You don't have to
15 believe." I mean, he states that.

16 Q. I am just asking whether in your
17 auditing process, you sometimes talked about
18 what you though were incidents in your
19 past-life?

20 A. Yes, you do that.

21 Q. Okay. And how many past-lives did you
22 think you had when you were in scientology?

23 A. This may take me a while. Do you
24 really want the answer to that?

1 Q. Would you say it is over ten
2 past-lives?

3 A. I suppose if I had --

4 Q. It was more than one, right?

5 A. I don't -- well, I guess so. Do you
6 want to nail down a number, or will more than
7 ten work?

8 Q. Is the theory that you were taught in
9 scientology that you go through successions of
10 lives on the time track, so that I can
11 understand this.

12 A. Yes. That's Hubbardian fact,
13 something like that, yes.

14 Q. And that is akin to the concept of
15 reincarnation, which I would understand as a
16 non-scientologist, that you live your life, you
17 die, and you come back as somebody else?

18 A. It is sort of akin to that, yes.

19 Q. And what is it that is the same, the
20 Thetan?

21 A. What do you mean?

22 Q. That is to say that when you live a
23 past-life, you die, and you come back, is what
24 comes back is that Thetan, in another body?

1 A. What are you talking about?

2 Q. You have heard the word "Thetan,"
3 right?

4 A. Yes.

5 Q. That is a space in time concept in
6 scientology?

7 A. But Thetan is not located in space of
8 time, so you can't come back, you never leave.

9 Q. All right. A Thetan is located not in
10 space and time, but in what according to
11 scientologists?

12 A. It is not located in space or time.

13 Q. Is it located in anything?

14 A. Well, what else is there?

15 Q. I don't know. That's what I am asking
16 you. You are the former scientologist. You
17 once knew it, right?

18 A. Well, I am not a scientologist. I
19 don't know if I ever have been. What is a
20 scientologist?

21 Q. Well, I don't want to get too far
22 afield, and I am simply asking -- let me put it
23 this way is the Thetan in scientology it is not
24 in space and time, but is exists as a spirit,

1 essentially?

2 A. The Thetan existed -- I suppose, if
3 you were to consider that he existed as a
4 spirit I suppose that is a possibility.

5 Q. Would you say that the closest
6 definition a layperson could understand of
7 Thetan would be the spirit?

8 A. You mean in terms of a definition?

9 Q. Yes.

10 A. No. That is just like apples and
11 oranges. That is like saying, "what's a book,
12 is a poem, any
13 one knows that." No.

14 Q. How is a Thetan different from what I
15 would understand the spirit to be?

16 A. Well, it doesn't -- but what does that
17 make it if it isn't around and if it isn't
18 located in space or time.

19 Q. So it doesn't just differ from the
20 concept of a spirit?

21 A. You are looking for a definition,
22 right, rather than another name for it.

23 Q. I am just looking for something that a
24 layperson could understand, a layperson who has

1 not been in scientology does not know what a
2 Thetan is. It is the closest concept in
3 vernacular English, spirit is that the closest
4 concept that matches Thetan?

5 A. I guess. You know, you are talking
6 about the same thing, regardless of what, right?

7 Q. Right. That's what I am asking.

8 A. The fact that you are whatever you are,
9 I mean, when you get right down to it, there is
10 no difference, right.

11 Q. Okay. So is the Thetan the being --

12 A. For me, I mean --

13 Q. We are all --

14 MR. GELLER: Chemically, there is no
15 difference from you?

16 A. I mean, chemically, look at him.

17 Q. Well, I'm not sure how to take that
18 Gerry, but maybe I won't try. Look is it true
19 that the Thetan that a goal in scientology when
20 you were in, was to become clear?

21 A. Correct.

22 Q. And by becoming clear that was to
23 remove any grams from both your present and
24 past-lives?

1 A. Well, they are not in, I mean, they
2 are not in the present or past-life, right,
3 they are in the reactive mind.

4 Q. Right.

5 A. They are in this consecutive record of
6 mental image pictures complete with 52
7 perceptics that supposedly you dragged along
8 with you through time, so to go back to your
9 earlier question the commonality of past lives
10 and this life is the bank, the bank is what is
11 in common to all Thetan, that is the only thing
12 that they have in common, right.

13 Q. Okay.

14 A. So we have nothing else in common
15 except for the reactive mind.

16 Q. And --

17 A. That's not necessarily a truth, but
18 that is Hubbardian truth.

19 Q. And in grams were acquired in both
20 present and past-lives, is fair to say, right?

21 A. Yes, that is it.

22 Q. Okay. Did you believe scientology
23 doctrine when you were in it on, let's say, the
24 issue that the Thetan exist and that the

1 past-lives exist?

2 A. Yes. Well, now, that is a real tricky
3 one, you know.

4 Q. Were there times that you believed it?

5 A. Well, it is more like times when you
6 simply, you know, when you couldn't believe it,
7 but some things the existence of something
8 beyond a bunch of cells, or whatever it is, you
9 know, I suppose, I mean, that is something that
10 to me is beyond question.

11 Q. You mean that man is not just material --

12 A. Well, I don't know about your
13 perception of the way it is, but I am trying to
14 get into beliefs.

15 Q. Yes.

16 A. Yes. Well, that never never leaves.

17 Q. You still believe that man --

18 A. But then you get into, you know, after
19 you take what you -- what are data, you get
20 into, you know, where you can have a cognitive
21 belief, where you can make some kind of a
22 selection of, okay, you know, everyone has
23 beliefs, here is what I'll take, I guess, so --

24 Q. I am just trying to expedite the

1 deposition, so we get the information, but we
2 get out of here as soon as we can too. Is it
3 fair to say that you still believe that man is
4 not just cells and matter, but has a spiritual
5 element?

6 A. Yes. I mean, I don't know if, you
7 know, that will do as a statement. You know, I
8 don't know --

9 Q. I am doing the best I can, Gerry.

10 A. I don't know if it is the whole thing,
11 and whether or not aside from that reality the
12 rest is illusion, so therefore, to qualify your
13 statement, but it's okay.

14 Q. And that was one of the beliefs that
15 you had when you were in scientology also,
16 correct?

17 A. What?

18 Q. That man is not just so much matter,
19 but is also a spiritual being?

20 A. Yes. It was either a belief or it was
21 something that was never, you know -- the only
22 time you ever get to consider that belief was
23 when you did the treason formula, I mean, that
24 was the answer to the treason formula, to find

1 out that you are.

2 Q. You mean that treason formula ends up
3 with a cognition that you are a spiritual being,
4 supposedly?

5 A. Well, it ends up with probably 25
6 hours of amends.

7 Q. But what you just said, Gerry, wasn't
8 what you just said that the treason formula
9 ends up with, as well, a cognition that you are
10 a spiritual being, isn't that what you meant
11 when you said that a minute ago?

12 A. No. A cognition to me is some kind of
13 a realization of some kind. You know, it is
14 sort of like to have that realization is sort
15 of, like, "Wow, the sun is up." And in five
16 minutes, "Oh, the sun!" You know, but it is not
17 that way.

18 Q. What did you mean when you said the
19 treason has to do with the spiritual being?

20 A. I had that one down as a fact of life
21 long before scientology, there is a continuity
22 there.

23 Q. Continuity in the sense that there is
24 a spirit, is that what you are saying?

1 A. I guess so, yes. Sort of like --

2 Q. Was the --

3 A. Hold on, let me get this. The only
4 time belief exists is when it is called into
5 existence by doubt, right? I mean, something
6 like that, when you get down to beliefs then
7 you can get into -- then you can get into, I
8 think, what happens in scientology.

9 Q. Okay. I just want to leave this in a
10 minute, but you said that the treason formula
11 had to do with this doctrine of spiritual
12 existence in some fashion, what did you mean by
13 that?

14 A. Well, that was -- you know, it was the
15 answer, anybody knew that, how do you get out
16 of treason, you put down, "find out that you
17 are, yes, I am."

18 Q. To find out that you are a spirit and
19 not a body, you mean?

20 A. Yes. That is how you get out of
21 treason, anybody knows that. It doesn't mean
22 like there is some great realization, like,
23 that is just what you put down.

24 Q. And treason is one of the conditions

1 in scientology, right?

2 A. Well, treason is a method, treason is
3 one of the sub-parts of a particular control
4 mechanism created by Hubbard and utilized by
5 him at least within the C Organization, and I
6 would say generally within the whole network of
7 scientology.

8 Q. And is treason one of the ways -- is
9 treason dealt with through the Fair Game
10 Doctrine?

11 A. Well, I suppose you could say that,
12 you know, aside from the fact, aside from what
13 we both know, right, that the Fair Game, the
14 Fair Game policy letter, treason, enemy, Fair
15 Game, right, but, certainly within -- it is a
16 concept used by the organization pursuant to
17 the Fair Game Doctrine, I mean, the Fair Game
18 Doctrine is a mind-set, which is kind of senior
19 to all of this philosophic stuff that we are
20 talking about. I mean, it is the thing which
21 mandates the whole operation of the
22 organization, that doctrine, to have that as a
23 philosophic doctrine, to have it as a
24 resolution of problems, that's what it is all

1 about. Treason is a -- treason is utilized
2 within that mind-set.

3 Q. Let me ask you, did you have a belief
4 in that man was a spirit prior to joining
5 scientology?

6 A. Yes. Absolutely.

7 Q. And was one of the reasons you joined
8 scientology, because you thought that it would
9 assist in releasing the spirit in some fashion?

10 A. Well, I suppose you could say
11 releasing the spirit in some fashion in that
12 the concept of exteriorization certainly was
13 given, that was a "one for one, you just
14 exteriorize them, all right, three feet back of
15 your head."

16 Q. Who told you that concept for the
17 first time, when do you remember it, was it '69
18 or '70?

19 A. Right away I knew. He is talking
20 about, I am going on through life, and I am
21 thinking what the fuck is this all about, you
22 know, I am 22, something like that, and all of
23 a sudden, yes, sure you are a spirit, not only
24 are you a spirit, but we can, or Thetan, and it

1 is not exactly a Thetan, we are talking
2 scientific definition, you know.

3 Q. Right.

4 A. The matter, energy, space -- you know,
5 relative to matter, energy, space and time. It
6 is all kind of taken care of, so there is whole
7 scientific cast to the whole thing, so sure you
8 know you are a being, so that --

9 Q. So when did he tell you, '69 or 70?

10 A. How do you take that being, because
11 that is -- I already know it has awareness, who
12 the hell else has awareness. He says not only
13 that, but you can have ultimate awareness, not
14 only that you can be courageous, strong, big
15 and tough and whatever.

16 Q. I just want to get back into the
17 exteriorization aspect of the thing.

18 A. I mean, you are talking about
19 intelligence.

20 Q. You can be more intelligent, but what
21 about the --

22 A. Not only that, but that's even
23 relative, because the more intelligent you are,
24 the more games you are supposed to get from

1 auditing.

2 Q. Right.

3 A. So it is just like --

4 Q. Accumulative.

5 A. Not only accumulative, but from the
6 starting point it moves on a slightly different
7 expediential curve from the other guy.

8 Q. Okay. But in terms of what they told
9 you initially in '69 or '70, when did you
10 become aware of scientology, '69?

11 A. Correct.

12 Q. And in '69 someone told you about
13 being three feet behind your body?

14 A. Well, it is in Hubbard's literature,
15 right. I mean, he says you can just give the
16 command and be three feet back of your head,
17 exteriorize it, a Thetan, that's it, and you've
18 got your one shot clear.

19 Q. And that is your spirit coming out of
20 the body and watching the body from another
21 place?

22 A. Yes, I guess, you could say coming out,
23 but the spirit doesn't move, so I guess the
24 body has to move.

1 Q. And was that something that you
2 thought was attainable when you joined?

3 A. Yes, that is a promised item.

4 Q. Did you ever experience what you
5 thought was that at the time?

6 A. No.

7 Q. You never experienced exteriorization?

8 A. The truth is, no.

9 Q. Okay. But at the time, did you think
10 you did?

11 A. No.

12 Q. Okay. It was something that you
13 wanted though?

14 A. Yes. It was, you know, after a while
15 you kind of kidded yourself, but it didn't
16 happen.

17 Q. Okay.

18 A. And that by definition makes me an
19 F.P., right?

20 Q. Now, you said in some deposition that
21 scientology was the closest you had ever come
22 to an organized religion. Do you recall that
23 testimony?

24 A. You would have to refresh me with the

1 actual deposition. The closest I had ever come
2 to --

3 Q. To joining an actual organized
4 religion?

5 A. The closest I had ever come to joining
6 an organized religion. Yes, I guess I haven't
7 really joined anything else that is organized
8 and it called itself a religion. I don't
9 recall. To answer your question, I don't
10 recall saying that in any deposition.

11 Q. But is it a true statement though in
12 this deposition that it is the closest that you
13 came to being a member of an organized religion?

14 A. Well, I started a religion, so, I
15 guess, and it has an organization, albeit,
16 rather, you know, lose, so maybe that is the
17 closest.

18 Q. Did you say you started a religion?

19 A. I don't recall the religion as a
20 Church.

21 Q. You started a Church?

22 A. Yes.

23 Q. This is since you left or when you
24 were in or what?

1 A. No. This is since I left.

2 Q. And what is the Church that you have
3 started?

4 A. I haven't really given it a name, well,
5 no one has given it a name, so it doesn't have
6 a name.

7 Q. Does it have a flock?

8 A. Yes. It has kind of a membership.

9 Q. And who are the members?

10 A. Boy, I would have to think.

11 Q. How many, do you think it is more than
12 20?

13 A. I think it's about 15.

14 Q. And it believes in the spirit also?

15 A. It only has, I think it only has one
16 belief. I am trying to recall.

17 Q. What is the belief?

18 A. The one belief, yes, it has a belief,
19 it has a corollary and it has a fact or truth
20 or whatever you want to call it. So the belief
21 is that whenever two or more members of the
22 Church are together, that God is present. And
23 the corollary to that is that it is always that
24 way, and there is another fact -- oh, yes, the

1 fact is that therefore whatever is said or done
2 between the members of the Church, when they
3 are together, is secret.

4 Q. When did you start it?

5 A. June 1986.

6 Q. That's when it was founded?

7 A. Yes. There are a number of
8 co-founders in a way, because no one really
9 likes to be a position, you know, the head of a
10 Church.

11 Q. Can you tell me of anyone else who is
12 a co-founder?

13 A. Let me think, Michael Douglas. There
14 are a whole bunch of people.

15 Q. Does this religion indulge in
16 spiritual counseling?

17 A. Well, again, I hate to call it a
18 religion, it is a Church and so far we have --
19 I think, just by its existence, sort of, by
20 being a member, it has its benefits, but there
21 is nothing set down, there is no -- we have no
22 procedures, yet.

23 Q. Tell me, did you, when you were in
24 scientology -- you were married when you were

1 in scientology, twice, right?

2 A. I was married twice while in
3 scientology.

4 Q. Okay. And were you married in a
5 scientology ceremony?

6 A. Yes. The answer is yes and no. And
7 the reason that it is that and we are talking
8 about the Terry Gilliam marriage is that I was
9 married legally a shore that was in Nassau in
10 the Bahamas, and then we had a, I guess, a mock
11 wedding, because I was already married, on
12 board the ship, and that was performed by Tony
13 Dunleavy as the Captain of the -- he was a
14 staff captain, I think, at that time, but as a
15 captain of the vessel while we were in Freeport,
16 so we were in Nassau, and then we got married a
17 couple of days later, sailed to Freeport and
18 while in Freeport had that other ceremony.

19 Q. And the ceremony that you had that was
20 a scientology ceremony was performed by someone
21 in a minister's outfit, a minister's collar?

22 A. No, I don't believe so. I think it
23 was a steward uniform.

24 Q. Was it someone you understood to be a

1 minister in the Church?

2 A. Again, I am not sure if it was done,
3 maybe that's what he said, okay.

4 Q. Okay. And when you were married to
5 Jocelyn, were you married by a minister?

6 A. No. I got married in Tijuana, Eduardo --
7 I forget his last name.

8 Q. Not a scientology wedding?

9 A. No.

10 Q. But from the beginning you knew there
11 was this scientology ministers, correct?

12 A. From the beginning?

13 Q. Yes, 1969.

14 A. No.

15 Q. When did you first find out that there
16 were ministers in scientology?

17 A. I guess sometime on board the ship.

18 Q. When is that, '71?

19 A. It's hard to say exactly when, because
20 I did see some of the G.O., publications in the
21 early days, so I can't give you an exact date,
22 but from the beginning, no.

23 Q. Okay. But you said it calls itself a
24 religion, right, do you recall that testimony a

1 minutes ago?

2 A. Yes.

3 MR. TABB: It being scientology?

4 MR. BLUMENSON: Yes.

5 A. Right.

6 Q. And you also knew it was called the
7 Church of Scientology, right?

8 A. When?

9 Q. Oh, in the early '70s?

10 A. Well, I would say, I definitely became
11 aware of the -- somewhere along the line, near
12 the early '70s.

13 Q. Okay. And you also, I believe,
14 testified before that time in the early '70s,
15 you understood that scientology could cure
16 disease; is that correct?

17 A. Yes. This was by when?

18 Q. Sometime in the early '70s.

19 A. Yes. It was offered that way and used
20 that way for physical --

21 Q. And in the way it could cure disease
22 was in part through the elimination of in grams
23 from present and past-lives; is that correct?

24 A. Right. You can could take an existing

1 condition and through the process of running
2 the incidents, which could have led to that
3 condition, for example, a pain in the head, or
4 an itch in the back, and the idea was that you
5 could eliminate, he was talking about peoples
6 withered arms.

7 Q. It sounds like Oral Roberts.

8 A. About cancer. No. Because it wasn't
9 couched in an Oral Roberts -- you are talking
10 about a guy who puts down the medical
11 profession for their inability to deal with and
12 to cure these diseases.

13 Q. He put down doctors, L. Ron Hubbard?

14 A. Oh, yes.

15 Q. He put down the medical profession?

16 A. Yes.

17 Q. And you knew that in the early '70s?

18 A. Because he had the tech.

19 Q. Okay. And one of the ways --

20 A. They were the mergence of chaos who
21 benefited from the creation of the disease or
22 the creation from the illness, who benefited
23 from keeping it going.

24 Q. So it was clear to you pretty near the

1 beginning that scientology rejected medical
2 science, traditional medical science?

3 A. Yes, I would say that fairly early.

4 Q. And it was clear to you fairly early
5 that the way you could cure disease is by
6 eliminating in grams that had been acquired in
7 your present and past-lives?

8 A. Read that question to me again.

9 Q. Well, was the method by which you
10 could cure disease to go through auditing?

11 A. That's it.

12 Q. And the way auditing would cure your
13 illnesses was by eliminating in grams?

14 A. Yes.

15 Q. And the way they would eliminate in
16 grams is to go into your present and past-life
17 on the time track and investigate the times
18 these in grams were acquired?

19 A. Well, you know, I don't know about if
20 they used the word investigate, but, yes, you
21 were running in grams, you were running in
22 grams, secondaries and locks, in addition to
23 the various other processes that were going
24 along at the same time.

1 Q. So to cure your disease, any diseases
2 or illnesses, you would have to go back to your
3 past-life time track if any in grams had formed
4 there, correct?

5 A. Well, I can't tell you for a specific
6 other person.

7 Q. Right. But in your case.

8 A. But I could give you an example.

9 Q. Okay.

10 A. In the C Organization, I acquired this
11 patch on my back, and the sucker itches and
12 while in the C Organization, I went through
13 shirt after shirt after shirt, just clawing my
14 back. Well, they ran that sucker and they ran
15 that sucker and nothing changed.

16 Q. When you say, "they ran it," did you
17 have to try and figure out the in gram by which
18 that was acquired?

19 A. It is not that --

20 Q. Discover it?

21 A. Whatever, you know, yes, you find you
22 locate whatever incident is supposed to have
23 caused this thing.

24 Q. And did you feel that you had found

1 that incident at any time?

2 A. Well, I mean, I was told that the
3 needle floated, so I guess there was certainly
4 that hope there, I mean, the reality is that --

5 Q. I am just asking you at the time that
6 you thought; and at the time was that in gram
7 acquired in a present or past-life, do you
8 recall?

9 A. I can't, you know, I don't have the
10 incident. I know that, you know, here is the
11 thing, you are talking about diseases, right.

12 Q. Right. Well, let me just get an
13 answer to that.

14 A. Gerald Armstrong, you know, I suppose
15 I had the average childhood diseases and
16 ailments or whatever, but that was not Gerald
17 Armstrong's item in getting into scientology,
18 so much, you know.

19 Q. To cure diseases?

20 A. Yes. I mean, the fact that you --

21 Q. Because you did not have any problems?

22 A. Right.

23 Q. Okay. That makes sense.

24 A. Okay. But the fact that it could do

1 it, you know, I'm not going to have any trouble
2 with a few mental phenomena, right, we are not
3 going to have any trouble. "All you have got
4 is you have difficulty communicating with
5 people." It was not like I was a complete
6 blithering idiot. I was talented enough, I
7 know, that they made the allegation that I was
8 a no nothing low level clerk, but in the same
9 breath, I was port captain of the Royal Barge,
10 so I was not a complete total incompetent, but
11 I had some mental phenomena, which I zeroed in
12 on in my own way and that was the resolution of
13 those things was was the promise of scientology.

14 Q. If I understand you and I just want to
15 get this clear in my mind. The problems you
16 wanted to deal with when you joined scientology
17 were not physical ailments or diseases, but
18 mental problems that you thought you had?

19 A. Well, I would tend to call it the
20 human condition.

21 Q. You were looking for answers to the
22 human condition?

23 A. All of a sudden in front of me was the
24 promise of all of the answers.

1 Q. Okay.

2 A. And not just a guy who says, "Believe,"
3 but a guy saying you don't have to believe, it
4 is imperially true, demonstrably true, and here
5 it is, you have just got to do this, okay, well,
6 I'll give it --

7 Q. Okay. I want to get to this, but I
8 just want to get to what I think is the case
9 clearly on the record, which is that although
10 you weren't concerned with this, what you
11 understood scientology could do for physical
12 ailments might require going to the past-life
13 time track and dealing with it, dealing with in
14 grams acquired in past-life, that was a
15 mechanism by which diseases could be cured;
16 isn't that fair to say?

17 A. The process of auditing, now, where it
18 took you, who cares.

19 Q. Well, I care now, because I am just
20 asking you --

21 A. Well, you are making -- there is
22 nowhere in scientology where it says, "You have
23 to leap into past-lives."

24 Q. But it maybe for a particular case?

1 A. There is the time when it might make
2 the jump that someone who doesn't get into
3 past-lives is a "shallow no confront case," so
4 you soon learn that in order to match up to the
5 Hubbardian expectation, you better get into
6 past-lives. That is not to say that it says
7 you have to, because the whole identical
8 process was being run before the great
9 past-life discovery in Dianetics.

10 Q. When was the past-life discovery --
11 that is a difference between Dianetics and
12 scientology?

13 A. What?

14 Q. Is that when Dianetics became
15 scientology?

16 A. No. Dianetics became scientology when
17 Hubbard lost the use of the name Dianetics due
18 to the bankruptcy during Purcell buying the
19 Dianetics foundation out of bankruptcy.

20 Q. When was the great past-life discovery
21 that you just referred to, in the '50s?

22 A. Yes, '50s, whenever Hubbard -- here is
23 the secrets: Hubbard says, "We can cure the
24 colds, we can cure that, we can cure a whole

1 bunch of things. Dianetics is the modern
2 science of mental health," right, it doesn't
3 work. So he says, "Aah, past-lives," that
4 doesn't work. "Aah, O.W.s," that doesn't work.
5 "Aah, body things," that doesn't work. "Clusters,"
6 that doesn't work. "Knots," I mean, that's the
7 way the game is.

8 Q. What are body things?

9 A. Thetans.

10 Q. Now, what were the mental problems
11 that you had prior to joining scientology that
12 you wanted to handle when you went to
13 scientology, you said you had certain mental
14 phenomena, do you remember that?

15 A. Yes. I would say that that is, you
16 know, the human condition, and my perception of
17 it, and my ability to be able to cope with it
18 and within it.

19 Q. Were there any specific problems that
20 you were having before you joined scientology
21 that you can put your finger on today?

22 A. Yes. I would say the -- there is
23 definitely a difficulty in communication. I
24 think I did -- I was, I think, up until then I

1 was disappointed in myself. I conceived of
2 myself as a failure. I conceived of myself as
3 having a great difficulty in pursuing anything
4 which was satisfying to me. And I perceived
5 that I was virtually the whole time living in
6 concepts, and the promise of clear was
7 something different from that. It was the
8 capacity to love without reservation. It was
9 the capacity or ability or reality of being
10 utterly in control of the mind. That is that
11 you could be here, in present time, totally
12 experiencing exactly what was going on, able to
13 make completely optimum rational decisions
14 toward the betterment of conditions.

15 Q. For yourself and for others?

16 A. Yes. I mean, clearly --

17 Q. I mean, did you have some interest
18 when you joined scientology in bettering the
19 planet or the community as well as your own
20 situation?

21 A. Yes. I mean, I can't talk for
22 everyone who got in, because, clearly, the
23 bottom line of scientology is intent, so I
24 can't talk for everyone, but certainly, yes, I

1 was, you know, I worked for all of those years
2 and I gave them, you know, my sweat and my
3 intelligence and whatever else I had, you know,
4 it was certainly not for in a large part Gerald
5 Armstrong.

6 Q. And you were altruistic at the time,
7 you wanted to help others?

8 A. Yes.

9 Q. And you made these representations
10 about what scientology could do to others, also?

11 A. Yes, I did.

12 Q. And you did it in as a truthful person
13 in the sense that you believed what you were
14 saying, generally, was the truth?

15 A. It's not all the time, because there
16 are times when I feel I absolutely lied and
17 absolutely did not give people things
18 truthfully. I perceived them as enemies and
19 acted as if they were enemies.

20 Q. Did you ever recruit people, just
21 public people, to join scientology?

22 A. Yes. I would take courses, sell them
23 books, yes, raw meat.

24 Q. Did you talk to them in that

1 exteriorization?

2 A. I probably did. I would have given
3 them the same pitch.

4 Q. That was given to you, is that what
5 you mean?

6 A. Yes.

7 Q. And at the time you gave it though you
8 were sincerely trying to help them, weren't you,
9 in your own mind? I know you don't agree with
10 that now, but at the time you were trying to
11 help people, weren't you?

12 A. You are looking at motivation, right.

13 Q. You were motivated when you did it,
14 right?

15 A. Right. So a big chunk of the
16 motivation was that you have got to perform,
17 and performance is production, and production
18 is getting the bodies in the shop and selling
19 them courses, so that was a bigger motivation
20 than, you know, to helping. It soon becomes
21 that.

22 Q. Let me ask you this, Gerry, you
23 wouldn't have told people about exteriorization
24 if you thought that you were hurting them

1 rather than helping them at the time; isn't
2 that true?

3 A. True.

4 Q. And even though you hadn't experienced
5 exteriorization, you thought it could work in
6 principal, right, when you said it?

7 A. Yes. I mean, it was the absolute deal.

8 Q. And you thought people could be more
9 intelligent through scientology when you said
10 that, too, right?

11 A. That was another of those offers.

12 Q. I'm asking, weren't you sincere when
13 you said it?

14 A. I don't -- in away, yes, and in a way,
15 no.

16 Q. Well, didn't you think it could
17 improve intelligence, when you told people that?

18 A. Yes.

19 Q. And didn't you think that it could
20 cure mental and physical problems when you told
21 people that?

22 A. Yes, in a way, you know, the reality
23 was -- son of a -- it's just, you know, it's
24 not -- I mean, for a long time I kept thinking

1 I am the only sucker, you know, that it is not
2 happening to and then you just kind of move
3 along.

4 Q. But you thought that was your fault,
5 right?

6 A. My fault, but I should have been
7 telling those guys, instead of smiling about it.
8 Could I possibly have told them -- let me just
9 look at it. If I told, "I'll tell you what you
10 ought to do, is you ought to check it out first."
11 That's not the way it was.

12 Q. I am not asking you what you believe
13 now, clearly, I am just trying to find out when
14 you were in it and recruiting people into
15 scientology, you weren't trying to lie to them,
16 you didn't have some malice or attempt to
17 defraud them in your mind, did you?

18 A. I don't -- you know --

19 Q. Just the best you can put yourself
20 back at that back at that time.

21 A. It's not like 100 percent, because it
22 is not completely honest, because you can't be
23 completely honest, because you can't really say,
24 you can't question Hubbard, you can't do any of

1 those things.

2 Q. Well, you did question Hubbard in your
3 own mind, didn't you in the early '70s?

4 A. But you couldn't. There was no one to
5 talk to about it.

6 Q. But what I am asking you is that your
7 belief at the time was that it could help
8 people with their problems. Isn't that why you
9 spent so much time with so little money in
10 scientology, that you had that belief at some
11 basic level?

12 A. Yes, I guess so.

13 Q. And you communicated that belief to
14 other people when you recruited them, right?

15 A. Well, you know, I communicated the
16 promise.

17 Q. Right. And you believed in the
18 promise until much later in scientology?

19 A. Yes, I guess so. It is clear that I
20 acted on that promise up until the end of 1981.
21 Only a completely mad man would have stayed
22 throughout all of that if they were not hooked
23 in with some promise of some better condition
24 of some kind, you know, imagine going through

1 all of the R.P.F., the lockups, the complete
2 and utter abuse from the guy at the top, going
3 through that. So you call it belief or you can
4 call it -- I mean, that is what -- that coupled
5 with the fear, because it is not a single
6 motivation probably to any act, so the fear
7 that was generated through time and the
8 absolute necessity of producing, because
9 failure to produce you have got a real serious
10 problem, so a lot of my acts, you know, both
11 motivations.

12 Q. Okay. But half of the motivation --
13 the belief in the promise.

14 A. The belief in the promise, the promise
15 that it was.

16 Q. The answer, the ultimate answer; is
17 that right?

18 A. Well, there were a whole bunch of
19 promises. The ultimate answer, but not quite
20 so nebulous, you know, we are talking specific
21 things and specific things in Gerald
22 Armstrong's life certainly by which he is going
23 to evaluate efficacy of this stuff and it was
24 definitely going to happen. First, it cleared,

1 so I went through all of that and then at OT3
2 and I went through all of that, and the reality
3 was that I came out and not only has nothing
4 happened, but this is, you know, this whole
5 thing here has been screwed with, because I not
6 only don't think the same, but I am awesomely
7 paranoid right now.

8 Q. I want to get to your present life
9 circumstances a little bit later, but let me
10 ask you one more question on these
11 representations. I think you have testified in
12 another deposition that the vast majority, I
13 forget it may have been 97 1/2 percent, but the
14 vast majority of scientologists are there for
15 altruistic reasons and sincerely believe that
16 it helps them and others; is that correct?

17 A. Well, I think that the percentage has
18 definitely gone down.

19 Q. Well, let's take at the time that you
20 were in it in the '70s?

21 A. Yes.

22 Q. It was the vast majority believed in
23 it as a helpful force in their own lives and in
24 others, right?

1 A. I think, yes, as the vast majority,
2 you know, who could know? But, yes, the vast
3 majority, I think, are completely duped, I mean,
4 I was. I look at the complete and utter
5 ignorance of this guy and then when the reality
6 about descends.

7 Q. Right. I want to go back to the --

8 A. Simply because of that reality, I
9 become the target of this organization.

10 Q. Okay. Gerry, at the time that you
11 were recruited, would you consider most of your
12 recruiters duped as well?

13 A. Yes. I think, yes.

14 Q. They were believers like you were a
15 believer shortly thereafter, right?

16 A. You know, to use the believer --

17 Q. They were sincere like you were
18 sincere?

19 A. Yes. I think a lot of them were. I
20 think that, because of the organizational
21 structure, because of the laws of the
22 organization, because of the incredible threat,
23 which is operated by the organization against
24 any individual or any individual part of it,

1 they would deliver those communications, so
2 because of those various motivations the
3 organization excerpts a tremendous amount of --

4 Q. But for whatever reason when they
5 brought you in, just like when you brought
6 others in, they were sincere, they were sincere
7 on balance in their beliefs that scientology
8 would help you, in terms of your mental,
9 physical, and other problems; am I right?

10 MR. TABB: If you can answer that
11 question about what other people knew.

12 A. Yes, and again, I can't. But the
13 people that I have met outside of the
14 organizational influence and that is very, very
15 few times, but once they get outside, they are
16 all remarkably, you know, sincere people. Like
17 most people for the most part. There are some
18 in that organization, you know, who are beyond
19 the pale. There are some individuals who are
20 absolutely insincere and whose motivation is
21 something completely different.

22 Q. When you were recruited --

23 A. So therefore those people are the ones
24 who are in control and they exert the force on

1 the other ones and the other ones do not
2 perceive that. They could be telling
3 themselves, as the organization is telling them,
4 that you are sincere if you commit these
5 atrocious acts, that is even a demonstration of
6 your sincerity.

7 Q. I understand that you are saying that
8 there is a small group at the top that is
9 insincere, as opposed to the large majority
10 that is sincere; is that right?

11 A. Well, sincere as far as one is able
12 within the organization to be sincere. For
13 example, let me focus on one issue.

14 Q. Let me focus on this issue. We will
15 expedite it if you let me ask the questions.

16 A. All right.

17 Q. When you were recruited the people who
18 recruited you, is it fair to say, they meant
19 you no harm?

20 A. That's probably true.

21 Q. Okay. Now, you said that in --

22 A. But organizationally --

23 Q. Let me ask you a question about
24 organizationally. L. Ron Hubbard audited it

1 himself, we established that in prior
2 depositions, correct?

3 A. Run that by me again.

4 Q. Didn't L. Ron Hubbard do self-auditing?

5 A. You mean only?

6 Q. He was audited by others and he also
7 did self-auditing; isn't that right?

8 A. I was never in on his sessions, so I
9 don't know what he did, but there certainly
10 were times when lights went on and you were not
11 allowed to go in certain areas because he was
12 in session and that is --

13 Q. And that was true of Mary Sue Hubbard,
14 also, she in sessions for hours a day sometimes,
15 wasn't she?

16 A. Not with the certain degree, but, yes,
17 there were times.

18 Q. Do you think she was just misleading
19 herself as to that it might do her some good or
20 do you think she actually believed that
21 auditing would do her some good?

22 MR. TABB: If you can answer what Mary
23 Sue Hubbard thinks.

24 A. You have got to understand and it's

1 what I said before and it comes down to intent,
2 because you can perform the same act and if the
3 intent -- with the different intent you have
4 got a whole different product.

5 Q. I understand that. I just want to
6 know a simple thing. Apart from all other
7 intents -- and I know what you have said about
8 L. Ron Hubbard and Mary Sue Hubbard and their
9 interest in money and all these other things
10 about fraud and so on, but what I am asking you
11 is when they were spending these hours doing
12 auditing or self-auditing or being audited by
13 others do you think that they thought that it
14 would help them?

15 MR. TABB: Objection. Mr. Blumenson,
16 how can he answer what they thought.

17 Q. Do you have any reason to believe that
18 they were doing that because they believed that
19 auditing worked?

20 MR. TABB: You don't have to answer
21 that question.

22 MR. BLUMENSON: That was a different
23 question.

24 MR. TABB: What was the difference in

1 the last question.

2 MR. BLUMENSON: The last question I
3 asked was: do you have any reason to believe
4 that when they did all of these hours of
5 auditing on themselves that they didn't think
6 it would work for them.

7 A. I can't tell you what's in their mind,
8 but --

9 MR. TABB: That's enough of an answer.

10 MR. BLUMENSON: No. I want an answer
11 to this, Michael.

12 A. But given everything that I know, and
13 given the insincerity of the parties who you
14 are referring to, I would say there is a real
15 good chance that their motivation was something
16 else, something different, whether or not it
17 was the acquisition of new powers, or whether
18 or not it was to get out of something, whether
19 or not it was to create some kind of a mental
20 dodge for the acts which were going on.

21 Q. What do you mean by "acquisition of
22 new powers"?

23 A. Well, scientology, this becomes the
24 intent again, it has a lot to do with at a

1 certain level, power. Power over people.
2 Power to do things.

3 Q. Be it cause, isn't that a concept of
4 scientologists?

5 MR. TABB: Pardon, what was the
6 question?

7 Q. To be it cause?

8 A. To be it cause is a concept, but that
9 is not what I am talking about right now.

10 Q. Okay.

11 A. Because you could be at cause and not
12 necessarily want to exert power or domination
13 over people. So that possibility certainly
14 exists, it is exemplified in what is called "the
15 flow of the bridge," the mission holders
16 conference. That is a demonstration of power.
17 And so, Mary Sue, if you wanted to use auditing
18 for that purpose, same as a demonstration, for
19 example, of the S.S., you can demonstrate your
20 will and your power simply by killing someone.

21 Q. That is the S.S., example you are
22 talking about?

23 A. Correct.

24 Q. You are not saying she killed someone?

1 A. I am not saying that, but as an
2 example of that choice of power and auditing
3 and the whole structure of scientology can be
4 used with that intent.

5 Q. How would auditing herself or himself
6 have given the Hubbards more power or
7 extraordinary powers in their own mind?

8 A. Well, take, for example, what we call
9 the affirmations.

10 Q. That is a Hubbard writing?

11 A. Correct. There is a statement wherein
12 he says, "I have a right to this sector," you
13 know, "I have the right to control men's minds."

14 Q. I think in a deposition you said you
15 saw a writing by Hubbard which said, "God has
16 given me power over this sector of the universe"?

17 A. Something like that.

18 Q. But it did mention God giving him this
19 power, correct, am I correct?

20 MR. TABB: Mr. Blumenson, you are
21 interrupting the answer.

22 Q. Am I correct?

23 A. Are you correct that God gave him the
24 power, or are you correct --

1 Q. Am I correct that you read some
2 document where L. Ron Hubbard said, "God gave
3 me this power over this sector of the universe"?

4 A. Something like that.

5 Q. Okay. Go ahead.

6 A. So that is a choice, you know, the
7 same guy could have authored an affirmation
8 which says, "I love the world," but, no, he
9 chose certain ones. So the same is true of
10 auditing. It can be used in whatever way you
11 want it.

12 Q. How do you think Hubbard was using
13 auditing, that's what I am trying to figure out.

14 A. Well, I would say that you could --

15 Q. I mean, auditing himself.

16 A. Again, understanding I haven't seen
17 his files I wasn't present when he was audited,
18 now, you are asking me for the ultimate
19 speculation, what he did with it. And I think
20 that he did. He kept himself continually
21 programed with that idea that he had the right
22 to do virtually anything, that he was right,
23 the guy was without a conscience. I mean, you
24 attorneys recognize immediately, this is

1 Hubbard apologizing? Give me a break. He
2 never apologized in his life. And you
3 recognize it, and he took his mind and just by
4 choice and by will altered it, so that he had
5 that capacity and that desire to control people.
6 He did it all by choice.

7 Q. And you think that his use of auditing
8 could have been a tool to gain control, his use
9 of auditing on himself could have been a tool
10 to maximize his abilities to control, is that
11 what you are saying?

12 A. He could have used it for whatever. I
13 am asking if you are asking me for my
14 speculation, I would say that whatever he got
15 out of it, that, I got out -- I just, you know,
16 I have difficulty with that kind of control.

17 Q. Okay. But you don't have any doubt
18 that at whatever level however nefarious
19 Hubbard used auditing as a way to improve his
20 own situation on himself, auditing on himself?

21 MR. TABB: Mr. Blumenson, you are
22 going way off the track.

23 MR. BLUMENSON: I will leave after I
24 get an answer to this specific question I am

1 going to leave the area.

2 MR. TABB: If Mr. Armstrong can answer
3 what Hubbard thought. We have a lot of ground
4 to cover and this isn't helping.

5 Q. Do you believe in all of these hours
6 that the Hubbards spent auditing themselves was
7 used sincerely as a tool for whatever purposes
8 they were trying to acquire from auditing?

9 A. I can't say that for sure. There are
10 probably times whether L. Ron Hubbard ordered
11 Mary Sue Hubbard audited or sect checked.

12 Q. What about himself though? Was he
13 sincere when he said auditing would help him?

14 A. I don't know.

15 MR. TABB: Answered.

16 A. I don't know what went on. I don't
17 know if he audited himself, but if he did audit
18 himself, then his intent is reflected by his
19 actions. I mean, that is what happened with
20 that guy. And if that is the product of all
21 that auditing, then that is, you know, that is
22 something other --

23 MR. BLUMENSON: Well, let's take pay a
24 five minute break.

(Brief break)

Q. Gerry, you said that when you joined scientology you weren't very happy with various aspects of yourself and your life, do you remember that?

A. Right. I would say myself and my life, that was pretty much it.

Q. And one of the problems was that you had no ability to pursue anything that satisfied you, or some words to that effect?

A. Yes. You know, this is, I guess, an offshoot of the whole thing that we are talking about. I was acutely aware of what was going on in my mind and that this appeared to be the human condition, and I certainly was on the track of resolution of it, I mean, that is why I --

Q. You mean you were seeking a resolution when you say you were on the track, or would you say you were making progress?

A. Well, I guess, the fact of getting on the path gives you some progress.

Q. You were looking for a solutions to these pretty profound problems, pretty profound

1 for how old were you then, around 20?

2 A. Yes, yes. Well, I got in when I was
3 22. Q. And you had some real

4 profound depression about the human condition
5 prior to joining scientology?

6 A. Well, I would not talk about profound
7 depression, like, profound depressions I have
8 experienced subsequently, I mean, nothing
9 compares with that.

10 Q. But it is pretty serious that you
11 couldn't have fun in anything you were doing in
12 the year before you joined, right?

13 A. Yes. I mean, it was not all black. I
14 was able to have fun.

15 Q. What did you mean when you said you
16 had difficulty pursuing anything that satisfied
17 you?

18 A. Oh, yes.

19 Q. What did that mean?

20 A. Yes. I could not choose whatever it
21 was Gerald Armstrong was going to do, where he
22 was going to go direct his talents and energy
23 and pursue that avenue. I didn't do it. I was
24 frustrated about that fact. It was on my mind

1 that, you know, the brief shot I had at the
2 university in 1968, it was all about that. I
3 could not -- I just --

4 Q. You couldn't -- let me try to get it
5 to a more concrete level only because --

6 A. You know, probably in the farthest of
7 reality, which is probably the way it has
8 boiled down, it becomes, you know, almost as
9 clear as this little smile on my face, right,
10 is that Gerald Armstrong was just being moved
11 along in this great thing, which finally
12 arrived through this scientological, you know,
13 my live with Hubbard, the big attack down to
14 today, you know, I have just been kind of moved
15 along.

16 Q. I am trying to focus on the life
17 before scientology.

18 A. Right.

19 Q. But you are saying that it is all part
20 of the same thing.

21 A. I am saying that there was a lot of
22 confusion back then, that is a reality. And
23 what was going on at the same time, you know,
24 are we to say that there was no meaning to this?

1 I mean, ultimately, it took on incredible
2 meaning. I mean, I am dealing with issues here,
3 which now to me are awesome.

4 Q. Okay. And I agree with you. But let
5 me, in order to expedite this --

6 THE WITNESS: Roger, you don't like
7 this, what else am I to say.

8 MR. GELLER: But you are not here to
9 please me, though.

10 A. Okay. All right.

11 Q. Let's focus exclusively on the year
12 before you became introduced to the Church,
13 which was, as I understand it, the year that
14 you were at the university?

15 A. Right. Okay. So the year before I
16 get introduced begins 1968.

17 Q. Okay. And that was a pretty bad year
18 for you?

19 A. Well, it was --

20 Q. You weren't happy, didn't you already
21 say that?

22 A. All right. Let's go back. 1968 we
23 are going to talk about?

24 Q. Right.

1 A. Not 1969, nothing about getting into
2 scientology.

3 Q. What was the first date that you were
4 introduced to scientology, do you know?

5 A. Let's say spring of '69.

6 Q. Okay. And you didn't really take on a
7 real active interest in scientology till when?

8 A. Summer.

9 Q. Summer of '69?

10 A. Well, active interest?

11 Q. Yes. When you started reading books.

12 A. No, no. I started reading books kind
13 of, like, right around the same period.

14 Q. When did you join the organization?

15 A. The first thing that I did, in the
16 summer of 1969, the first time I entered their
17 doors, that was a franchise called "Scientology
18 Little Mountain" and that was in the summer of
19 1969, and I went
20 down --

21 Q. Do you remember if it was July or
22 August?

23 A. I don't know. Let's say June or July.

24 Q. Okay.

1 A. Because by the end of the summer or
2 even, yes, by the end of August, I had moved to
3 Vancouver and was enrolled.

4 Q. The mission was in Vancouver?

5 A. Correct, yes, the franchise.

6 Q. You didn't go through any scientology
7 doors until after the school year was up,
8 correct?

9 A. What are you talking about?

10 Q. Until after the university year being '68
11 to '69 was up?

12 A. I couldn't even tell you. I think I
13 dropped out around Christmas. I was only there,
14 you know, a few months.

15 Q. So when you dropped out of the
16 university, you hadn't even heard of
17 scientology yet?

18 A. Correct.

19 Q. Now, let's talk about that year or
20 that half year of school at the University of
21 British Columbia, is it?

22 A. Correct.

23 Q. Why did you drop out?

24 A. I would say that it had to do with all

1 the things that I told you about.

2 Q. That you weren't getting any
3 satisfaction out of education, is that one
4 reason?

5 A. Well, I had -- yes. I was having -- I
6 could not pursue it. I was aware in everything
7 that I did in the university and all of the
8 time that I was there and everything that I had
9 anything to do with was always on this
10 awareness of the way my mind is working and the
11 fact that whatever is going on here is somehow
12 different than from what I am doing.

13 Q. You were alienated from what you were
14 doing in the school, you were watching yourself
15 from afar.

16 A. I don't know whether it was from afar
17 or whether it was from close, but I was living
18 out of concepts.

19 Q. Okay. You were not --

20 A. It is nothing different. I don't know
21 any one who doesn't.

22 Q. Well, let me ask you, what kind of
23 things were you pursuing that you couldn't get
24 satisfaction out of?

1 A. Well, I told you, school.

2 Q. School is one. What about friendships?

3 A. I had -- yes, I guess so.

4 Q. You were having problems with
5 friendships also?

6 A. Well, yes, I had difficulty, you know,
7 communicating to virtually everyone.

8 Q. You had trouble with virtually
9 everyone?

10 A. I had trouble communicating. So if it
11 is a new situation, you know, or if it is a new
12 individual, it is difficult. An old individual,
13 it's difficult. All of it was difficult

14 Q. You weren't forming good friendships?

15 A. I lacked it. Well, in truth I
16 probably was, you know, I have friends that are
17 around. I am not connected to anyone from that
18 era at all.

19 Q. You somehow did not --

20 A. I suppose there were some people
21 around who I knew there who would consider me
22 friends, but that, it was something else, you
23 know. You know, I was searching in my own way
24 and scientology got me right at the choiced

1 moment.

2 Q. You mean when you were were feeling
3 the most miserable?

4 A. Well, probably, when is was the most
5 confused, "The most ripe," as Hubbard said, "in
6 need of change."

7 Q. When you say you weren't able to
8 communicate with people in 1968, do you have
9 any insight now as to what the reasons were why
10 you couldn't communicate, or what went wrong in
11 your attempts to communicate in, let's say,
12 your classmates or other friends?

13 A. You know, I can't tell you this in the
14 specific situations, but I would say that -- I
15 don't know -- I lacked faith.

16 Q. And by "lacked faith," you mean you
17 lacked any, what, confidence, that you could
18 have relationships with people, is that what
19 you mean?

20 A. It's not that kind of a thing, but
21 rather, yes, it's sort of, I think, if you have
22 got faith, or whatever that thing is, so that
23 you don't have to remember anything, so that
24 you know that there is nothing that you have to

1 do, so that it really doesn't matter one way or
2 the other the outcome, that's radically
3 different from my perception of me back then.
4 So, you know, scientology didn't take care of
5 that issue. And subsequent to scientology,
6 it's just been a continual process to, you know,
7 take that thing and grapple with it and fight
8 with it and resolve it to the point where, you
9 know, for stretches at a time it is just alpha
10 waves
11 (indicating).

12 Q. Did you date when you were in college
13 or in high school?

14 A. Date?

15 Q. Have dates with women?

16 MR. GELLER: Girls at the time.

17 MR. BLUMENSON: Right.

18 A. Yes, I think so. There were a few.

19 Q. I think you testified somewhere that
20 you had trouble with women prior to scientology;
21 is that right?

22 A. Hey, you tell me someone who doesn't
23 have trouble with women at any time.

24 Q. What were you referring to when you

1 said that you had trouble?

2 A. Yes. It was definitely a problem.

3 Q. But is it fair to say that you
4 couldn't establish intimate friendships with
5 men or women or boys and girls, maybe I should
6 say, prior to your joining the Church?

7 A. It is not totally true. I had
8 friendships, and I had girlfriends, and I had
9 love affairs, and, in retrospect, they were all
10 wonderful.

11 Q. But at the time they were not
12 satisfying at all, right?

13 A. You know, they could have been, but I
14 certainly was not satisfied with Gerald
15 Armstrong and his capacity to love without
16 reservation.

17 Q. Didn't you say earlier that you had no
18 capacity to love in that area?

19 A. Well, you know, even -- you know, oh,
20 you are talking about a big subject. And I
21 don't know if even the murder's act of homicide
22 is, in fact, not the highest expression of love
23 that he is capable of at the time. So in the
24 ultimate context, I don't know. Following that

1 statement, you know, you're connected to a
2 religion of some sort. So there is, and you
3 are aware of, the idea of love being all
4 encompassing and taking in the whole bit. So
5 was I capable of the fluidity in the subject
6 that I am capable of now, no, no. It was not.

7 Q. You are capable of something now -- I
8 didn't gather what it was, fluidity? You are
9 capable of something now that you weren't in
10 1968?

11 A. Now, it is different, and I can't even
12 tell you why, it is just radically different.

13 Q. You were talking about your
14 relationships with people or with women?

15 A. Yes, the whole world.

16 Q. Okay. You feel that you have
17 something now, which you did not have in 1968?

18 A. Well, I don't know if I have or I
19 haven't, but the whole thing is different.
20 It's all different.

21 Q. Well, what did you mean when you said
22 you had fluidity now that you didn't have in
23 1968?

24 A. Well, now, it is more like
quanta. It's phases, but it is not exactly

1 parabolic. So I shift from, well, you know, in
2 terms of a curve, it sort of is like, at one
3 time there is the reality of terror, and if you
4 can get by that, see, my feeling about this
5 whole thing is that no one, especially no
6 organization, has the right to, you know,
7 instill this much terror.

8 Q. I'm going to move to strike that.
9 That is not what I am talking about now.

10 A. What I am trying to explain to you is
11 that you are looking for absolutes and it
12 shifts.

13 Q. No. I am --

14 A. Sometimes it is this way and sometimes
15 it is this way.

16 Q. But I am just asking you -- you made a
17 remark in 1968 in your relations with men and
18 women, you didn't have the fluidity that you
19 have now. And I am trying to see what that
20 means. Do you mean that your relationships
21 with people are more meaningful now than
22 they were in 1968, is that a rough
23 approximation of what you mean?

24 A. I don't think you can qualify

1 relationships, you know, meaningful in terms of
2 what, ultimate product achievement?

3 Q. Do you have more of a capacity for
4 intimate relationships now than you did in 1968?

5 A. Oh, yes.

6 Q. And do you have more capacity to be
7 loving now then you did in 1968?

8 A. Yes.

9 Q. And do you have more capacity to
10 exercise good judgment than you did in 1968?

11 A. The exercising of judgment is
12 something that I have never quite quantified
13 before, but, I think, that the judgment is
14 different.

15 Q. Do you have more of a capacity to
16 communicate than you did when you were
17 complaining of that communication back in 1968?

18 A. I would say, yes.

19 Q. And why do you have more ability to
20 communicate now, do you know why?

21 A. I think, because I have worked so
22 intensely on that subject over the last longest
23 time.

24 Q. How many years?

1 A. I think since leaving the organization.

2 Q. How have you worked on it?

3 A. In my own way.

4 Q. How was that?

5 A. Well, I mean, I have various things
6 that I do, and part of it is the writing, I
7 guess. I mean, the ultimate, you know,
8 whatever alteration I suppose there has been,
9 it has certainly, you know, been most intense
10 in probably the last couple of years, and
11 that's when really all of the writing has taken
12 place, so there is that.

13 And then there is the the mental
14 processes that I put myself through, and there
15 is the physical things that I do, and there is
16 the exercising of will, I guess, which, you
17 know, has been a big chunk of it.

18 Q. You said exercising that you do, do
19 you mean physical exercise?

20 A. Yes.

21 Q. What kind of physical exercise?

22 A. Well, it's like Tork, T-o-r-k. It's
23 the utilization --

24 Q. Is that isometrics?

1 A. I guess, it is sort of isometrics.

2 Q. Is there body building involved in
3 this?

4 A. You mean, weights?

5 Q. Or any form of body building.

6 A. It is just generally "will," I think.

7 Q. All right. And do you do any kind of
8 aerobic exercise, swimming or walking long
9 distances?

10 A. I walk real fast.

11 Q. As a form of exercise?

12 A. Well, generally as a form of staying
13 out of danger.

14 Q. Well, that's clear, but do you study
15 martial arts?

16 A. Not as a general practice.

17 Q. Let me ask you now in all seriousness,
18 Gerry, do you do aerobic exercise for the sake
19 of exercise, the exercise that you were talking
20 about a minute ago?

21 A. I thought -- when you say, "aerobic
22 exercise," you mean, my walking?

23 Q. Walking, swimming, running.

24 A. I walk because I don't have a car and

1 because -- I walk fast, because there is a
2 certain amount of security in it.

3 Q. Okay. And do you take long walks
4 daily, like half an hour or more daily?

5 A. It probably reaches a total of half an
6 hour. It could be more depending on if I to
7 somewhere other than to work.

8 Q. Right. Okay. Tell me, you went to
9 school after you left the Church, right?

10 A. The organization?

11 Q. The Coastline Community, if you want
12 to call it "organization," the Coastline
13 Community College, right?

14 A. Yes.

15 Q. And you got pretty much straight A's
16 there, didn't you?

17 A. Yes, I guess.

18 Q. You took several prelaw or legal
19 courses there and got all A's, right?

20 A. Yes.

21 Q. 4.0 average?

22 A. Right.

23 Q. Would you describe yourself as a good
24 student there?

1 A. You mean, in terms of the marks I got?

2 Q. In terms of your abilities in those
3 law courses.

4 A. Yes, I have a pretty good ability.

5 Q. And what were your grades in the
6 University of British Columbia, do you recall?

7 A. I don't think -- well, I have never
8 seen my transcript, and I never applied for it.

9 Q. Did you take exams?

10 A. I believe, I wrote one or two at the
11 first year. I think, I mean, it was not good.

12 Q. And do you think that your ability to
13 study now is improved over the 1968?

14 A. I would say that, yes, because of the
15 learning process that, yes, it's radically
16 different.

17 Q. And it was pretty bad in 1968, correct,
18 your ability to study?

19 A. No. My ability to study was, I think --

20 Q. Your ability to study in a disciplined
21 way in school was pretty minimal in 1968,
22 wasn't it?

23 A. Yes. But unfortunately it is not
24 great still.

1 Q. But it is a lot better?

2 A. Well, you have got the same intellect
3 there, I mean, I had, you know, I am not the
4 best student in the world in terms of
5 application, because that is the way my mind
6 goes, but back in those days, I had that same
7 intellectual capacity, but I did not have --
8 and I, you know, with no way of which to
9 evaluate it relative to now -- I did not have
10 that thing capacity, or whatever, to stick to
11 that.

12 Q. You didn't have the ability to apply
13 your intellect in the studies?

14 A. I had the ability to apply, but I
15 didn't.

16 Q. You just didn't?

17 A. I was just so into that whole fucking,
18 mad process, you know, that intellectual thing.
19 I mean --

20 Q. When you use "mad," are you using it
21 to mean crazy, or are you using it to mean bad,
22 or what, mad as crazy?

23 A. Well, I suppose the human condition,
24 you know, I mean, it's like, the way Hubbard

1 described it, you know, "homosap," he called it,
2 the regular humanoid.

3 Q. Let me ask you something.

4 A. I couldn't tolerate the regular
5 humanoid existence.

6 MR. TABB: It's one o'clock. Can we
7 go to lunch.

8 MR. BLUMENSON: Can I have two minutes,
9 and then we will break for about an hour?

10 A. So am I smarter now, no. In fact, I
11 am stupider.

12 Q. Well, you have a better ability to
13 apply yourself in school now than you did in '68,
14 we have established that, right?

15 A. Well, we are not sure, because I am
16 not going to school.

17 Q. Well, let's say at Coastline Community
18 College.

19 A. Again, I did what I did, right, and I
20 am no longer there.

21 Q. Gerry, let me ask you --

22 A. So similarly there is no completion,
23 right, you take a look at the great, you know,
24 the high school marks, I mean, they are roughly

1 equivalent and then it got rather, you know,
2 screw with my mind playing pool and poker.

3 Q. Let me ask you something, then we will
4 break for lunch. You worked many long hours in
5 a very disciplined way in scientology for years;
6 isn't that true?

7 A. Yes.

8 Q. And Eddie Walters said in his
9 deposition that one thing that scientology does
10 do is it trains people in an ability to work
11 very hard and apply themselves to work very
12 hard, would you agree with that?

13 A. No, no. It brings in those people who
14 have that capacity and it utilizes them. Does
15 it give it to you, no way. Did I do it before,
16 I logged in the great Canadian west, you know,
17 bone wreck, Gerald Armstrong.

18 Q. In terms of study, you studied for
19 hours in scientology, sometimes hours a day,
20 right?

21 A. Scientology did its level best to
22 screw with whatever kind of capacity Gerald
23 Armstrong had for learning.

24 Q. Okay.

1 A. When I left scientology, I made quite
2 an effort to get rid of that programing, you
3 know, because you have got to realize, you know,
4 I don't know that you get to take credit for
5 anything that happened in that time, simply
6 because 12 1/2 years intervened, you go from 22
7 through 35 --

8 Q. Let me ask you just one last question
9 and --

10 A. -- and now through 40.

11 Q. When you got these straight A's at
12 Coastline Community College, what was that 1980 --

13 A. '82 and '83.

14 Q. '82 and '83, were you suffering from
15 any disability of intellect?

16 A. Disability of intellect?

17 Q. Yes. Was there any problem you had at
18 studying at Coastline Community College or
19 grasping the material that you were supposed to
20 be learning?

21 A. Well, you know, there was a real
22 problem at the end, because I just could not
23 get into it at all.

24 Q. Well, when you were taking courses

1 there, my question is --

2 A. So you find some dropped out courses
3 that is around the time that the litigation
4 accelerated, and I simply could not do it.

5 Q. What I am asking is in the courses
6 that you completed, were you suffering under
7 any disability?

8 A. Intellectually, there is a continuity.
9 Intellectually, there is a continuity. If you
10 take the emotional track, it is something else.

11 Q. I am just asking you -- this one
12 question is all I want to ask you: when you
13 were taking these courses and getting straight
14 A's, were you under any intellectual disability
15 at that time at Coastline Community College in
16 1982?

17 A. An intellectual disability?

18 MR. TABB: Do you understand the
19 question?

20 Q. Were you aware of any intellectual
21 disability you had in 1982 when you were at
22 Coastline Community College?

23 A. Intellectual disability, no. It's
24 difficult to answer, because in trying to

1 analyze all of these things, it seems like
2 there is an intellectual continuity throughout
3 the whole thing. I don't know that
4 intellectually that -- well, that is not
5 exactly true, because it is altered, you know,
6 if the emotional strain or the emotional
7 whatever, you know, there are the times of
8 coming unclued, and there is the the whole
9 terror about this subject, which certainly
10 impacts on the intellect, but it seems like
11 there is continuity from the beginning. Like,
12 I am that part of the mind or that reasoning
13 process or that capacity to reason, I think,
14 there is continuity in.

15 Q. From 1965, you mean, all the way to
16 the present --

17 A. Yes.

18 Q. -- or as far as back as you can
19 remember?

20 A. Yes. But there isn't like gaps, but
21 that is just that one side of it. And then,
22 you know, the whole emotional play which goes
23 along with it, that is a whole different story.
24 So that impacts on the intellect at times and

1 at times overrides.

2 Q. So what was the disability you were
3 suffering from when you were taking courses in
4 the fall semester at Coastline Community
5 College, in the fall of 1982?

6 A. Well, I think that everything that I
7 have talked about, I mean --

8 Q. You consider you were disabled as a
9 student in the fall of 1982?

10 A. Well, I think that I was disabled as
11 an individual. I mean, I was into the analysis
12 of who in each one of the classes is a plant.

13 Q. You feel that you were under such
14 disability in the fall of 1982 that you were
15 not able to properly study?

16 A. I think that I was not able to
17 properly integrate into those classes, yes.

18 Q. And scientology caused you to fail in
19 your endeavor at Coastline Community College?

20 A. Well, I think that I didn't fail in my
21 endeavor. I don't think we could call it a
22 failure. So did scientology --

23 Q. In other words, scientology did not
24 interfere with your studies at Coastline

1 Community College or your intellectual
2 abilities?

3 A. No. It interfered incredibly.

4 MR. BLUMENSON: Let's break for lunch
5 and we will be back at 2:10.

6 MR. TABB: That's fine.

7 (Lunch break)

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A F T E R N O O N S E S S I O N

BY MR. BLUMENSON:

Q. Gerry, during the Christopherson trial, you set up sort of an office space for yourself in Gary McMurray's office, is that fair to say?

A. I don't think it was quite unilateral, but there definitely was a -- for the first, I suppose, month or so that I was up there, they had a little a small conference room, and when it was not being used, and even sometimes when it was being used, if the reason for its use was scientological, then there were other people there, but generally it was just a room like this.

Q. Which you used?

A. Wherein I sat and did things. Was it an office, really, no, but I did some writing there and drawing, that sort of thing.

Q. Okay. You wrote --

A. Then after that -- and I couldn't give you an exact date, but sometime thereafter -- I moved my bag of tricks down to another space in a different part in the Rank & McMurray firm. And it was in kind of a file, I guess, you

1 would call it a file room, and there was a
2 table, and I sat at the table and did whatever
3 I did if I was in the office.

4 Q. What you were doing there is writing,
5 essentially, or most of the time; isn't that
6 right?

7 A. Well, I wrote, I drew, I guess, yes,
8 that's it. Even if I was working on anything
9 to do with that case or my case, it comes down
10 to writing.

11 Q. But a lot of what you were doing was
12 writing for yourself, right?

13 A. Some of it, yes.

14 Q. And were you writing sort of a
15 commentary about what was happening in the
16 trial among other things?

17 A. No, I don't believe so.

18 Q. What were you writing?

19 A. Well, I wrote a couple of affidavits.
20 I wrote letters. I wrote, I guess, during that
21 period, I certainly wrote some of whatever was
22 going on in my mind, my consciousness, whatever
23 came to mind. I can't tell you right now
24 exactly.

1 Q. Did some of it concern scientology?

2 A. Well, I guess, yes, in a way.

3 Q. Did some of it concern your mental or
4 physical state?

5 A. During the McMurray time?

6 Q. Yes.

7 A. Yes.

8 Q. What happened to those writings?

9 A. I think they were for the most part,
10 some of them are around.

11 Q. Where, with you, or with your attorney,
12 or some other place?

13 A. They are with the attorney.

14 Q. Michael Flynn?

15 A. Yes. Or they are in the office.

16 Q. Do you have any idea how voluminous
17 these writings were, would they be more than
18 200 pages?

19 A. When you say, "these writings," are
20 you referring just what I wrote during the
21 period while I was in one or the another office
22 in McMurray's place?

23 Q. Yes. That's start with that.

24 A. No. I would not say that they reached

1 200 pages.

2 Q. It was between 100 and 200, possibly?

3 A. You are talking letters, you are
4 talking everything that I wrote there?

5 Q. Yes.

6 A. Well, okay, in those offices 100, 150
7 to 200 pages.

8 Q. And these letter were to your friends?

9 A. Well, some of them were letters to
10 friends. Some of them were -- as you know, you
11 guys got some of my letters to Dan Sherman from
12 that period.

13 Q. Who else were the letters to?

14 A. I can't recall right now.

15 Q. What other friends did you have during
16 that period that you might have written to?

17 A. Oh, the Douglasses. Oh, maybe Jim or
18 Nancy Dincalci. Maybe Jocelyn. Maybe old
19 girlfriends. I don't know. I can't recall all
20 of them right now.

21 Q. Do you keep copies of what you write,
22 like, those letters, would you Xerox them, so
23 that you would have the a copy?

24 A. No, not all of them, it's unfortunate.

1 Q. Some of them you did though, right?

2 A. Some of them I have.

3 Q. And does your attorney have that now,
4 or do you have them?

5 A. Well, I think those that I have got, I
6 have got.

7 Q. And your attorney has some others?

8 A. I can't tell you what I don't have.

9 Q. And did you ever write to your parents
10 during that period?

11 A. I may have. I don't have a
12 recollection of it, but I was there and, you
13 know, while I was there, I lived in places, and
14 I probably did more writing in other places
15 that I lived than I did in the office.

16 Q. Okay. Are you -- since I haven't had
17 an opportunity to read your objections to the
18 subpoena duces tecum, are you refusing to
19 produce those writings?

20 MR. TABB: There is an objection to
21 those writings.

22 MR. BLUMENSON: Okay.

23 MR. GELLER: To the letters.

24 MR. TABB: Letters and writings, I

1 believe the manuscript, but I am not certain
2 what the request asks for.

3 A. Yes. It is all objectionable. It is
4 all irrelevant, and it is all an invasion of
5 privacy.

6 Q. Now, you said in a deposition of
7 yourself on June 3, 1985, in the Wallershon
8 case, that you have done a lot of about two
9 months before this deposition was taken in June
10 of '85, you had done a lot of writing, "Which I
11 do for myself concerns the whole process of
12 scientology and the part of the massive
13 manipulation that Hubbard plays." Do you
14 recognize what writings you are talking about
15 there?

16 A. No. You would have to show me the
17 whole thing.

18 Q. Have you done writing on the process
19 of scientology and massive manipulation by
20 Hubbard, as you say here?

21 A. You would have to show me the whole --

22 Q. I am just asking you: have you done
23 writing on the subject?

24 A. I may have touched on that subject,

1 but read the whole thing, because I know what
2 you are talking about.

3 Q. Gerry, you have written hundreds of
4 pages, haven't you, concerning scientology,
5 Eugene Ingram, L. Ron Hubbard, Michael Flynn,
6 and related subjects relating to scientology,
7 haven't you?

8 A. Well, yes.

9 Q. Hundreds of pages?

10 A. Yes.

11 Q. Hundreds of pages concerning your
12 experiences in scientology and afterwards,
13 correct?

14 A. Yes.

15 Q. And are you producing any of those
16 pages?

17 A. No. That is all work -- anything to
18 do with, you know, Michael Flynn, the strategy,
19 all of that stuff, I mean, that is all working
20 on the case, I have thousands and thousands of
21 pages of that stuff, but that is --

22 Q. And you have also written thousands or
23 hundreds of thousands of pages, which is
24 intended to be published, isn't that right,

1 concerning scientology, Eugene Ingram, L. Ron
2 Hubbard, I mean, we have already established
3 that in this entire deposition, right?

4 A. Well, that is probably a different
5 thing from, you know, whatever you were reading
6 from regarding the massive manipulation.

7 Q. But you do have thousands of pages, or
8 between hundreds and thousands of pages on the
9 subject of scientology and your experiences in
10 and out of it, which you intend to publish some
11 day, too, right?

12 A. Well, you are talking about art work
13 now, right?

14 Q. As well as writing. I am talking
15 primarily prose?

16 A. It is all art work. The stuff that is
17 not -- the stuff that is not, you know,
18 directly to do with the case, with the strategy,
19 with the facts, with the whole, with all of
20 that, that's all art work.

21 Q. And when you say, "art work," does
22 that include prose, that is written words?

23 A. Correct.

24 Q. Okay. And that would include

1 statements about your life in scientology, you
2 would call "art work," written statements that
3 you wrote about scientology and your life in
4 scientology, you are terminating here as "art
5 work"; is that correct?

6 A. That's what we are talking -- you know,
7 to differentiate between that and documents,
8 which are not part of any -- which are not
9 literary in form, which are not artistic in
10 form, which do not have to do with the process
11 and the legal battle and that sort of thing.

12 Q. So you are dividing these documents
13 into what you consider work product, statements
14 of yours about your case and other things?

15 A. And the manuscript.

16 Q. Okay. And other things, which are not
17 so-called "work product," but art work, you are
18 making that distinction, right?

19 A. Well, that is what I make in my mind,
20 yes.

21 Q. An you are not producing either of
22 those categories, are you?

23 A. No. Both of them are -- both
24 categories have -- those that have to do with

1 the case, have to do with my work on the case.
2 Those that have to do with anything else, have
3 nothing whatsoever to do with the case and
4 those have, to me, potential, right now,
5 literary and artistic value.

6 Q. But these are also documents that
7 concern your life in scientology and since
8 scientology, we have established that, right?

9 A. In that there is a connection to
10 everything in the universe, yes.

11 Q. Well, Gerry, didn't you say that you
12 had written a book that concerns, among other
13 things, Eugene Ingram's activity?

14 A. Well, the title "On the Trail of
15 Eugene M. Ingram" was a working title, which I
16 gave to the book at a given time.

17 Q. And Eugene Ingram is an investigator
18 of the Church who you believe has runs the
19 Church or ordered harassment of you?

20 A. Well, he carried out harassment of me
21 certainly.

22 Q. Do you have any tape recordings of
23 your sessions with Jim Dincalci?

24 A. Well, I think so. I think they were

1 turned over to you guys.

2 Q. How many was "they"?

3 A. What?

4 Q. You said, "They were turned over," how
5 many were the sessions?

6 MR. TABB: What sessions? What do you
7 mean by sessions, Mr. Blumenson?

8 A. I think there was one tape and when I
9 say, "they" I made a duplicate, and so I am
10 pretty sure that Julia turned one over, and if
11 she didn't --

12 Q. Well, you had several sessions with
13 Jim Dincalci, right?

14 MR. TABB: Would you please define
15 what you mean by sessions?

16 MR. BLUMENSON: Meetings with Jim
17 Dincalci on separate days or each individual
18 day would be a session.

19 A. These could be called sessions, and
20 they are, I guess, the nearest term for what
21 they are, would be religious counseling, and I
22 do not waive any privilege relative to those;
23 any statements there, any documents there, any
24 tapes there.

1 Q. But you have turned over one tape,
2 right?

3 A. Well, there only is one tape.

4 Q. Okay.

5 A. When I say, "tapes" --

6 Q. Wasn't there a procedure that you used
7 in which all of your meetings with Jim Dincalci
8 were supposed to be taped, wasn't that part of
9 the procedure?

10 A. Part of what procedure?

11 Q. Of the spiritual counseling you were
12 getting or religious counseling.

13 A. Well, there were only two times when
14 this happened. And one -- my recollection is
15 one was taped.

16 Q. Now, as far as you know your attorney
17 has turned over one tape?

18 A. My recollection is that there is only
19 one tape.

20 Q. Okay.

21 A. When I said, "tapes," the only reason
22 I said that was because I got a call from the
23 people to whom I had sent it and they said
24 there were two tapes. One is a duplicate. I

1 had it duplicated, so that they could keep one
2 and so that they could give you guys the other
3 one. So that whatever you got is the only tape
4 in existence other than exact duplicates of it.

5 Q. Okay. I understand, Gerry. Okay.
6 Did you listen to this tape after the facts of
7 the session?

8 A. I listened to it, I guess, when I sent
9 it to Julia.

10 Q. Okay. And do you recall saying -- by
11 the way, this was a counseling session you had
12 with Jim Dincalci in the summer of 1985, right?

13 A. Okay.

14 Q. And do you recall telling Jim that, "I've
15 spent my whole life leaving things. I have no
16 roots"?

17 A. Well, you know, this is like auditing,
18 right? I am not going discuss it. I don't
19 think I should have to discuss it.

20 Q. Well, is it a true statement that you
21 spent your life leaving things?

22 A. Just, you know, to reiterate --

23 Q. You have made a claim of privilege, if
24 I understand what you are saying; however, your

1 attorney has turned over this information to
2 the Defendants, and so your attorney and you
3 have waived any privilege by giving this
4 information over. So I feel --

5 A. I don't see that at all. I don't
6 waive any --

7 Q. Privilege is --

8 A. Are you waiving the pre-standard
9 privilege by giving me my statements?

10 Q. I don't believe there was --

11 A. You have got them, but I am not
12 waiving it.

13 Q. Are you going to refuse to answer --

14 A. Anything to do with the contents of
15 those things. I mean, clearly he is talking
16 about matters -- I mean, you are talking about
17 really, you know, matters of spirit or religion
18 or whatever, you know, somewhat different from
19 the way in which scientology has couched its
20 therapy, you guys claim it and this is religion.
21 Surely something that is more religious cannot
22 be less.

23 Q. Well, you say it is somewhat different
24 from scientology. That means it is somewhat

1 the same as scientology and somewhat different?

2 In some ways it is similar?

3 A. Take the two -- let's call them
4 processes.

5 Q. Right.

6 A. There is both a, you know, if you were
7 to use the priest penitent privilege paradigm,
8 there is a priest and there is a penitent. If
9 you were to use the psychotherapeutic paradigm
10 then there is the patient and there is the
11 professionals, there is the therapist, so --

12 Q. So in terms over it being both
13 psychological and religious counseling, they
14 have both of those aspects in common, Dincalci
15 processing and scientological processing?

16 A. They have at least that, you know,
17 there are two people talking.

18 Q. Okay.

19 A. You know, certainly, you know, you're
20 talking about, clearly, there you are talking
21 about things of the spirit --

22 Q. Well, I asked you, did you say --

23 A. And you want --

24 Q. -- that you had spent your whole life

1 leaving things and not having roots. I think
2 it is very relevant to this lawsuit, and I
3 think it is -- I am not belittling it by any
4 means.

5 A. I know.

6 Q. I think it is at the heart.

7 A. Well, I think it is at the heart, too,
8 because now, not only have you violated your
9 own so-called "religious tenant," not only have
10 you violated those and violated my privacy and,
11 by the way, I think it might be appropriate to
12 move at this time to include a cause of action
13 for the invasion of privacy, not only on that,
14 but for the whole video taping and for other
15 things that have gone down, and I would do that.
16 So not only have you violated me as an
17 individual and all of those representations,
18 which scientology and Hubbard have made about
19 the so-called "sanctity" of preclear folders,
20 not only do you violate that, but you are going
21 to violate it in another completely different
22 context. You say, I don't have that right.
23 You think you can use those things.

24 Q. I don't want to get into this. This

1 is one of the issues that the judge is going to
2 have to decide like so many other decisions,
3 Gerry?

4 A. In that the judge is going to have to
5 decide it, I think, certainly, at this point,
6 you should not ask any more questions which you
7 got from that source.

8 MR. BLUMENSON: Let me ask two
9 questions to make clear the parameters of this.
10 Mr. Tabb, do you know whether any objection was
11 raised to turning over this tape, the Dincalci
12 tape?

13 MR. TABB: I don't know specifically
14 the circumstances of the turning of it over.
15 My understanding was that the objection was
16 discussed. I don't know whether it was raised
17 or not.

18 MR. BLUMENSON: Okay. So you are not
19 instructing your client not to answer.

20 MR. TABB: On the grounds of we are
21 uncertain of what the status is at this point,
22 I think I am going to have to instruct him not
23 to answer, because we don't know what the
24 circumstances are.

1 MR. BLUMENSON: All right. If the
2 circumstances turn out to be that it was given
3 without objection to privilege or that the
4 objection to privilege was overwritten, will
5 you stipulate that we will have an opportunity
6 to ask questions based on that transcript at a
7 future time?

8 MR. TABB: It depends on whether we
9 get the information elsewhere from other things.
10 If it is redundant information, and my guess is
11 that if you are going to go over and, you know,
12 if it is within the confines of the outline. I
13 am not going to come back here and say, "Whatever
14 document you get, I am going to go back and let
15 you question Gerald Armstrong about every
16 statement he has ever made in any document."

17 MR. BLUMENSON: All right. Just to
18 make the record clear, you are foreclosing any
19 questions concerning information that Mr.
20 Armstrong gave to Mr. Dincalci or which are
21 derived from statements that Mr. Armstrong gave
22 to Mr. Dincalci at this time?

23 MR. TABB: At this time, yes, I am
24 going to, however, confer with California

1 counsel and if I get difference instructions
2 from California counsel by tomorrow, I will let
3 you know, and at that time we can go into it if
4 I get different instructions, but at this time
5 I am going to foreclose discussion.

6 MR. GELLER: Off the record for one minute.

7 (Discussion off the record)

8 BY MR. BLUMENSON:

9 Q. Did you seek any other form of
10 religious counseling other than from Mr.
11 Dincalci after leaving?

12 A. I suppose, independant of anything
13 else, I don't think from any other individual
14 that I never had any other counseling of any
15 kind.

16 Q. Did you go through est training? I
17 think that is on the record somewhere.

18 A. Yes. I don't know if we could
19 construe that as religious counseling.

20 Q. Your wife said -- well, in her
21 deposition, said, "It was religious." Do you
22 have any idea why she would say that.

23 A. I suppose because of the contrast to
24 scientology. It is sort of like if scientology

1 is, this has got to be. So that would provide
2 you with a reason.

3 Q. Did you spend two weekends in est?

4 A. Correct.

5 Q. And that is the normal training
6 program for est, correct?

7 A. Yes.

8 Q. Do you think it did you any good?

9 A. Yes, I kind of think so. I mean, I
10 got through the two weekends.

11 Q. What benefits did est, provide for you?

12 A. I think it assisted in the
13 understanding of scientology and what
14 scientology had done.

15 MR. TABB: Mr. Blumenson, how is this
16 responsive to the lawsuit?

17 MR. BLUMENSON: He says that he was
18 damaged, and I am trying to find out what it
19 was that they did that was damaging.

20 MR. TABB: in the outline it's been
21 set forth as the --

22 MR. BLUMENSON: Do you have that
23 outline there?

24 MR. TABB: I have it right in front of

1 me, which was submitted by Mr. Randolph as the
2 grounds for what the deposition of Mr.

3 Armstrong would be. MR. LONG:

4 That is correct, but at the hearing -- and you
5 can check this with Julia -- Judge Breckenridge
6 did not require us to stick to that outline.

7 MR. TABB: But he stipulated that he
8 would, and we have the transcript here, too.

9 MR. BLUMENSON: Well, look, there is
10 no question that this is within the outline
11 anyway, because the outline includes
12 Armstrong's, Gerry Armstrong's, damages,
13 physical and mental, and his present condition.

14 MR. TABB: Fine. What does that have
15 to do with it?

16 MR. BLUMENSON: Well, what benefits he
17 got from est go to his present mental and
18 physical condition, and that's why I am asking.

19 MR. TABB: Mr. Blumenson, this is
20 getting far afield. We are not answering
21 questions about est.

22 MR. BLUMENSON: Well, you know
23 relevance is reserved for court. Are you
24 asserting a privilege here?

1 MR. TABB: No, Mr. Blumenson. I am
2 saying it is beyond the scope of the order of
3 Judge Breckenridge and the stipulation from
4 your counsel, both Mr. Randolph and Mr.
5 Peterson, and we are not answering any of those
6 questions.

7 MR. BLUMENSON: It's calculated to
8 lead to admissible evidence on Mr. Armstrong's
9 present mental and physical condition.

10 MR. TABB: It is outside the scope,
11 Mr. Blumenson. Please continue the deposition.

12 MR. BLUMENSON: It is not outside the
13 scope and, in addition, if he is claiming --
14 you know, either it could have been benefit
15 efficiently, which Mr. Armstrong says it was,
16 or it could have been detrimental. In either
17 case, it goes directly to whether scientology
18 has damaged Mr. Armstrong, whether some other
19 source damaged him, or whether he is damaged at
20 all. There is no question that it is relevant
21 on that. There is a way to find out
22 information. He already said that he has
23 benefited from est, which is spiritual and
24 mental training, as I understand it, and to

1 that degree it goes directly to his present
2 condition.

3 MR. TABB: Go ahead, Mr. Armstrong.
4 It is not directly relevant, it is outside of
5 the scope of the outline. We take our stand
6 here.

7 Q. You heard about est when you were in
8 scientology, didn't you?

9 MR. TABB: I am going to ask Mr.
10 Armstrong not to answer on the grounds that it
11 is not in the scope of the outline of the
12 deposition.

13 MR. BLUMENSON: Wait a second. We are
14 going to have real problems here if you are
15 going to instruct that, you know, that is
16 really for the judge to decide. If I am going
17 afield from this outline, which I don't believe
18 I am, but if I am going afield, I will get my
19 just deserts from the judge, but it is not --
20 we have stipulated at the beginning of this,
21 Mike, that the only objections are as to form
22 and privilege. Anything that goes to relevance
23 is for the judge to determine, because it is
24 reserved for court.

1 MR. TABB: According to Judge
2 Breckenridge, I don't think the deposition
3 should go on item for item. As long as there
4 is something reasonable that is being cleared
5 into it is fine, but to protract it -- let me
6 just say, it becomes protective, the counsel
7 seeks for protective order. Mr. Peterson, who
8 is counsel for the Church of Scientology, I
9 think he is well protected by his attorneys
10 that if they felt we were going off astray or
11 into an areas that is irrelevant to this case
12 or something that is happening in this
13 deposition, they can adjourn and seek an order.

14 Mr. Blumenson, if you continue on this
15 line of questioning outside of the scope of the
16 outline, we will adjourn right now and seek an
17 order.

18 Now, I would like to raise this for
19 the time being, but why don't we go onto areas
20 that are relevant.

21 MR. BLUMENSON: I am going to ask a
22 question, which I consider highly relevant.

23 MR. TABB: Which is?

24 Q. When you were in scientology, had you

1 heard that est was a squirrel group?

2 MR. TABB: It is outside the scope of
3 the ourline? Please, go to another area.

4 MR. BLUMENSON: It is not outside the
5 scope, Mike, and I am not going to give you a
6 road map --

7 MR. TABB: How is it?

8 MR. BLUMENSON: If you would allow
9 this questioning to proceed for two minutes, it
10 would become obvious, but I am not required to
11 give you the road map of what these questions
12 are in advance, I really am not, Mike.

13 MR. TABB: I am instructing my client
14 not to answer.

15 MR. GELLER: It is a preliminary
16 matter.

17 MR. TABB: Off the record.

18 (Discussion off the record)

19 MR. GELLER: Back on the record.

20 MR. TABB: But I am telling you where
21 I am going and whatever.

22 MR. BLUMENSON: Will you just allow
23 the witness to answer the question as to
24 whether he heard it was a squirrel group or

1 what a squirrel group is, and after that we
2 will layout why it is relevant, but this is a
3 preliminary question and there is no prejudice
4 to you.

5 MR. TABB: It doesn't justify the
6 issues here, because, Erick, you digress.

7 MR. BLUMENSON: I do not need to
8 justify these questions in advance, because
9 that may tailor the testimony of the witness,
10 if I have to say every implication --

11 MR. TABB: Erick, we are here to get
12 information --

13 MR. BLUMENSON: Let me finish.

14 MR. TABB: -- not for you to raise
15 debating points and Browniepoints.

16 MR. BLUMENSON: No, no. Look, Mike,
17 let me finish my point. If I am allowed to
18 give you a road map of implications of each
19 answer that means that the witness hears it,
20 and I do not want to provide the implications
21 of each question before it is answered, because
22 that may have a conscious or unconscious effect
23 of tailoring testimony by the witness. And you
24 know that as well as I do.

1 MR. TABB: Mr. Blumenson, this is
2 discovery. It is not cross examination. We
3 are not here to make arguments in front of a
4 jury. We are here to get information.

5 MR. BLUMENSON: If you want to refuse
6 to answer this, what I see is obviously
7 unprivileged, obviously relevant, and obviously
8 harmless in question in terms of your interests,
9 if you want to adjourn to go to court, you
10 should. But there is no justification for you
11 to say unilaterally, "I am going to block this,
12 so the judge doesn't even have an opportunity
13 to rule on whether it is relevant or not,
14 because I am not going to allow the information
15 on the record." That is what you are doing,
16 Mike, and it is against the rule and it is
17 against our stipulation, and it is needless to
18 go into this kind of colloquy.

19 MR. TABB: Mr. Blumenson, I have made
20 my point. We are not going to answer any
21 questions unless they are relevant questions.
22 If you can come up with a relevant question
23 that is within the guidelines of the
24 stipulation, we will go into it, but this

1 question isn't. If you want to forego your
2 foundation question and ask a relevant question,
3 we will go.

4 MR. BLUMENSON: I want an answer to
5 that question, and if you are not going to give
6 it, I am going to foreclose in a whole range of
7 questions, that I think are relevant,
8 needlessly.

9 MR. TABB: I don't think so. Ask a
10 relevant question.

11 MR. BLUMENSON: Hold on, I want to
12 consider it for one minute with my client as to
13 whether or not we should go to court right now
14 to compel.

15 MR. TABB: No, Mr. Blumenson, we are
16 going before Judge Breckenridge, don't be silly.
17 This court has no idea of what the stipulation
18 is.

19 MR. BLUMENSON: We have every right
20 under the rules to go to the local court and
21 require an answer, and we may have to do that.

22 MR. TABB: That is not what Judge
23 Breckenridge decided.

24 MR. BLUMENSON: Did he say that?

1 MR. TABB: First of all, from the
2 proceedings, Judge Breckenridge assumed that
3 this was going to be in California. No one
4 informed him that it was.

5 MR. GELLER: I think that Mr. Tabb is
6 right that this issue has to be addressed to
7 Judge Breckenridge only because this is not
8 pursuant to an for an out-of-state commission
9 in Massachusetts.

10 MR. BLUMENSON: According to the rules
11 and, certainly, if Judge Breckenridge said this
12 all had to come before him, I would agree
13 immediately that it has to go before him, but --

14 MR. TABB: If you want to look at the
15 transcript, you are welcomed to look at it.

16 MR. BLUMENSON: Let me finish. But if
17 you show me some line and page, where he says
18 that, I will definitely abide by it. I am not
19 aware of any such understanding, and in that
20 case, in order to expedite this deposition,
21 because it is supposed to take place today, the
22 rules give us the option of going to a local
23 court on a motion to compel or motion for
24 protective order on your case. And you know, I

1 don't want to stop so that we all have to go to
2 California for a simple question that is
3 obvious and relevant.

4 MR. TABB: We have two days of
5 questions, and we have plenty of relevant
6 questions. Why don't you ask your relevant
7 questions and propose an inquiry and then we go
8 back when it is all over. I mean, you are
9 being unnecessarily obstructive at this point.
10 I have made my objection.

11 MR. BLUMENSON: Let me talk with Ken
12 Long for a moment.

13 (Brief break)

14 BY MR. BLUMENSON:

15 Q. Gerry, do you know what a squirrel
16 group is in scientology?

17 A. Well, yes, I can give you the various
18 perspectives, I think --

19 Q. Isn't the essential thing about a
20 squirrel group that it is some other
21 organization that is using scientology or --

22 MR. TABB: Objection.

23 MR. BLUMENSON: Wait a second, let me
24 finish.

1 MR. TABB: Objection. I just have to
2 make an objection.

3 MR. BLUMENSON: I will rephrase the
4 question.

5 MR. TABB: Thank you.

6 Q. Isn't it fair to say that scientology --
7 what a squirrel group means is that it is a
8 rival organization, which is using scientology
9 tact or a version of scientology tact without
10 authorization?

11 A. That is whose definition?

12 Q. Isn't that a scientology definition,
13 roughly speaking?

14 A. Again, you have got to get into levels
15 of this thing.

16 Q. Was that accurate?

17 A. No.

18 Q. What is inaccurate about it?

19 A. Well, take, for example, Gerald
20 Armstrong. You guys put out an issue, you know --
21 is a big -- O.S.A.E.D., of some sort, squirrels,
22 Gerald Armstrong and a whole raft of others --
23 I don't know. I mean, aside from the fact that
24 Hubbard uses the English language to some

1 degree, that is about the amount of Hubbardian
2 technology that I use. So I don't know how --
3 no, squirrel does not mean that. Squirrel is
4 just a derogatory term like suppressive person.

5 Q. Gerry, is the Advanced Ability Center
6 considered a squirrel group?

7 A. By whom?

8 Q. By scientologists.

9 MR. TABB: To the extent that you can
10 answer the question.

11 Q. Is it named as a squirrel group?

12 A. Well, Gerald Armstrong was named as a
13 squirrel group.

14 Q. I didn't ask that. I asked if the
15 Advanced Ability Center --

16 A. Undoubtly.

17 Q. And is the reason that is given --

18 A. A squirrel --

19 Q. Excuse me. Was the reason given, when
20 it was name as a squirrel group, because it was
21 bastardizing scientology technology?

22 MR. TABB: If you can answer the
23 question about why someone called something
24 else.

1 A. Yes. The reason -- among other
2 reasons, probably, but a reason given.

3 Q. And a reason that est was considered a
4 squirrel group is that it was using scientology
5 technology without authorization; isn't that
6 fair to say?

7 A. That is not the reality of it. The
8 reality of it is that Hubbard needs enemies.

9 Q. I am not asking?

10 A. While you are trying to get a
11 definition at a certain level of the
12 scientological hierarchy which would go with
13 the reality that you want to create. I don't
14 buy it, because there were various levels of
15 awareness in --

16 Q. Gerry, this is a simple question.

17 A. No, it is not simple.

18 MR. TABB: Will you keep it down,
19 gentlemen.

20 A. It is not simple, because you are
21 attempting to pigeonhole it in a particular way.

22 Q. Wait a second. I am trying to
23 expedite it and it will expedite it if we deal
24 on the most simple level we can. Okay. I

1 understand that there are a million levels of
2 awareness of realities and that every question
3 has a million implications, but all I asked is,
4 didn't scientology announce that est was a
5 squirrel group, because, at least in part,
6 because it was using scientology technology
7 without authorization? You had heard that when
8 you were in the Church, hadn't you?

9 A. Something like that.

10 Q. Okay. And there is an overlap, is
11 there not, between what est uses in its
12 training and what scientology uses in its
13 training; isn't that true?

14 A. Well, in the sense that you have live
15 human beings involved.

16 Q. What about some of the technologies
17 that were used?

18 A. Give me an example.

19 Q. Well, I am asking you.

20 A. I saw that it was, in fact, in intent
21 and in reality almost diametrically opposed.

22 Q. And that is after you went you saw
23 that --

24 A. Oh --

1 Q. -- or did you know that in advance?

2 A. I had a pretty good idea in advance.

3 Q. From who?

4 A. From the individual -- probably, from
5 the people who got me involved or initially
6 mentioned the subject.

7 Q. Who was that?

8 A. I think the Dincalcis and maybe the
9 Douglasses, but all four of them had done it
10 prior to my doing it. Another part before I
11 got involved in est, if you call that doing the
12 weekend thing an involvement, I knew of the
13 hunger project, and so I had read some of the
14 material regarding the hunger project, and knew
15 more about it than I knew about the whole est
16 thing.

17 Then there was the person to whom I
18 went and they had this -- it was, like, what
19 they call a guest seminar, which is, like,
20 that's where they sort of read you for the
21 weekend. From that person as well, I did not --
22 you know, there was nothing explained about
23 what was going to happen, but from whatever was
24 said, I picked up at that time the contrast

1 between the reality and intent of scientology
2 and the reality and intent of est.

3 Q. Did est promise you greater
4 intelligence?

5 A. I don't believe there were any
6 promises made of any kind.

7 Q. Did you have any concern --

8 A. And that was a blessing.

9 Q. Did you have any concern or fear of
10 joining a group, which had been identified at
11 least by some as using scientology type
12 techniques?

13 A. Have any fear?

14 Q. Yes. Did you have any reluctance to
15 join est after having heard that it uses
16 scientology techniques?

17 A. Well, you know, I don't think that it
18 is adjoining of it.

19 Q. Of going through the training.

20 A. Well, what was significant to me, in
21 fact, yes, there was a great deal of fear
22 involved with it, because I was at that time
23 going through the process of attempting to
24 confront, grapple with, all those things, which

1 scientology states are inimical, threatening,
2 evil, all of those things.

3 It's like -- and I made -- "Aah,
4 psychologist," and when you talk to one, after
5 being imbued with this hatred for them for such
6 an amount of time, it takes a certain amount of
7 courage to get involved. And I deliberately
8 got involved for that reason. If Hubbard said
9 that it was threatening to be feared and to be
10 hated, I better find out what it is.

11 Q. All right. Is it fair to say that you
12 did have a certain amount of fear about going
13 to est because it had been named as using
14 scientology technology?

15 A. No. The actual line, which I recall,
16 which stuck in my mind about est, was that no
17 one in scientology could obtain or could get or
18 become involved in what they call "the upper
19 levels," if he had even been to a guest seminar
20 in est until est had been destroyed. So I
21 thought what is it about this? Not that they
22 were using scientology process.

23 Q. How much did you pay for est?

24 A. I think it was 400 beans.

1 Q. You mean, dollars, right?

2 A. Right. That was the beans theory.

3 Q. That he was the for two weekends?

4 A. Yes. You know, there is a first deal
5 and then there are the two weekends and then
6 there is another night, and then they give you
7 a book.

8 Q. Do you think est is a rip-off?

9 A. You know, I never thought of est as a
10 rip-off, I mean -- yes, I never, I have never
11 had that thought.

12 Q. Did you attain more contentment in
13 your life after the last est session?

14 A. No. I think by the last session of
15 est, I think I was utterly terrorized.

16 Q. Why?

17 A. Because in the middle of it, right in
18 the middle, slap dab, between the two weekends,
19 which are, you know, you're sitting with a
20 group of people, aside from lunch breaks and
21 dinner breaks, a great number of hours, so
22 there are I would say psychologically, it has
23 the potential of being an altering experience.
24 But right slap dab in the middle of those two

1 weekends, I learned that you guys ripped off
2 the photos. I went in and had the
3 confrontation with Steve Marlow and the rest of
4 those guys, Terry Gamboia, I stayed up 24 hours
5 terrified. And I went and saw Michael Flynn in
6 Clearwater all within the middle of that on
7 weekend. So it was a mind altering experience,
8 but est played very little part in it.

9 Q. Well, you said you got benefits out of
10 est, though, earlier?

11 A. Well, as I think I explained, the --

12 Q. What were the benefits that you got
13 out of est, when you left that last session
14 what did you feel you benefited by?

15 A. I believe I benefited at that time, I
16 mean, the way I kind of felt, I mean, again,
17 you have to understand that the -- whatever
18 happened in est, is just nothing in compared
19 with what was going on in the real world of
20 scientology during --

21 Q. Okay. But what are the benefits that
22 you attributed to est?

23 A. Well, there is the fact of doing it,
24 so I got through that. There was the -- it

1 added something to my -- during that process,
2 that's when I began to hit on the realization
3 and alter the circuitry about the fact that
4 Hubbard didn't have to do it. That's when I
5 began to understand that aspect of it.

6 Q. How did it benefit you?

7 A. I am telling you.

8 Q. Okay. I am trying to understand, but
9 that is a little obscure to me when you say "Hubbard
10 didn't have to do it." I am trying to see how
11 that benefited you. Basically, my question is:
12 what benefits did you obtain after that week in
13 est and during which you told us about your
14 confrontation you had with the Church? At the
15 end of that week what were the benefits you
16 felt?

17 A. Well, I am telling you. There was
18 that awareness, which was coming up at that
19 time, that's what I can recall.

20 Q. And can you describe it in a way that
21 I can understand a little more clearly, what
22 you mean by that awareness?

23 A. You don't have to go to prison to
24 experience freedom. You don't have to bludgeon

1 your friends for them to grow as a result of
2 the aversion therapy or whatever you run.

3 Hubbard didn't have to do it. There is no --

4 Q. You mean, Hubbard didn't have to have
5 a highly disciplined, you know, have all of the
6 discipline that is in scientology -- I am just
7 trying to understand -- is that what you mean,
8 basically?

9 A. Well, that is true. He didn't have to
10 do any of it. He didn't have to. You don't
11 have to do anything.

12 Q. People say --

13 A. In that you don't have to do anything,
14 certainly, why choose to do those things which
15 just screw people up.

16 Q. You were -- as I understand it just
17 from what I read in the newspapers -- when you
18 took est you weren't allowed to leave the room
19 during these long hours, correct, even to go to
20 the bathroom?

21 A. Well, that's not true.

22 Q. You were allowed to leave in the
23 middle of whatever they were doing to go to the
24 bathroom, for example?

1 A. Well, I would think that if you had to
2 go to the bathroom you would be allowed to
3 leave.

4 Q. But when you went to est,
5 didn't you know that they kept you in the room
6 and, as you say, isolated you from people, so
7 that you could have the possibility of an
8 altering experience?

9 A. No. I don't think that you are
10 isolated from people at all. I think that, in
11 fact, there were probably a couple of hundred,
12 I don't know, maybe 100 people --

13 Q. Isolated from the people outside the
14 audience of the est room. You knew that you
15 were going to be held in that room, to hear
16 someone talk to you, and that through that kind
17 of intense experience, you might undergo some
18 mental alteration; isn't that right?

19 A. No, no. Well, I had heard some of
20 things that you are talking about, but that was
21 not the reality of it.

22 Q. But that's what you thought when you
23 went.

24 A. Listen, no, no. When I was held in,
you know, Five Field Manor --

1 Q. I am going to withdraw the question,
2 because this is completely non-responsive about
3 what you expected in est.

4 MR. TABB: It is beyond the scope of
5 the deposition.

6 A. You asked me about being held, okay.
7 It is sort of like -- am I being held right now?
8 What would you say, yes.

9 Q. I asked you when you went to est, did
10 you expect to be kept in a room and given an
11 intensive experience, which would end up with
12 some alteration of your psyche?

13 A. No. I kind of didn't expect that.

14 Q. By the way, just on that issue of your
15 being held, you say that you were held against
16 your will in 1976?

17 A. Right. That's a different --

18 MR. TABB: Just answer the question
19 yes or no, Gerry.

20 A. Yes. That's being held. The est
21 situation was different.

22 Q. Why was that being held?

23 A. Well, because there I am held in and
24 kept under guard.

1 Q. Okay.

2 A. I can't leave. There is no way.

3 Q. Well, were you under guard when you
4 were doing research at the University of
5 California library?

6 A. Yes.

7 Q. Was there a guard there all of the
8 time?

9 A. Correct.

10 Q. Who was that?

11 A. I know one name, Bruce Hamilton.

12 Q. Okay.

13 A. And the other peoples' names, I don't
14 know. You people have refused to provide the
15 records of that incarceration. You have not
16 provided them. You got them, but I don't have
17 them. But Bruce Hamilton --

18 Q. By "incarceration," you mean the 1976
19 incarceration?

20 A. That's the one I am talking about,
21 correct.

22 Q. Okay. But during some of that
23 incarceration, you at that University of
24 California library doing some research, correct?

1 A. Under guard.

2 Q. And you were in the microfilm section
3 of the University of California library?

4 A. Correct.

5 Q. And did you use Xerox machines there
6 or make copies of things?

7 A. Yes.

8 Q. And did you check out things from the
9 library?

10 A. I guess so.

11 Q. And did you see a few other people who
12 were not involved in scientology at all in the
13 library?

14 A. Yes.

15 Q. And did you have conversations with
16 librarians at any time?

17 A. I suppose, to get microfilm maybe.

18 Q. And did you tell anybody at all who
19 wasn't a scientologist that you were being held
20 there against your will at that library?

21 A. No.

22 Q. And did you ever raise your voice?

23 A. I have, yes.

24 Q. No. I mean, in that library.

1 A. In the library?

2 Q. Yes.

3 A. I have no recollection.

4 Q. How many days were you incarcerated in
5 the University of California library?

6 A. When you use incarcerated, you are
7 talking about the same incident?

8 Q. Yes. That is your testimony.

9 A. So under guard is the same to you as
10 incarceration?

11 Q. You used the term "incarcerated."

12 A. I said, I was incarcerated at the Five
13 Field Manor. You opilated the incarceration
14 to the time when I was under guard and the
15 microfilm department at the University of
16 California library.

17 Q. No. Were you being held against your
18 will at the University of California library?

19 A. Yes.

20 Q. And did you ever tell anybody at the
21 University of California library that you were
22 a captive?

23 A. No. I was terrified.

24 Q. Did anybody have a gun on you?

1 A. I don't know.

2 Q. Did you or anybody see any weapons
3 while you were there at the University of
4 California library?

5 A. I don't believe I saw them. I don't
6 recall any.

7 Q. How many weeks were you there under
8 guard at the University of California library
9 doing research?

10 A. I guess, a week or two.

11 Q. Okay. You say you were held against
12 your will there, right, you didn't want to be
13 there; is that right?

14 A. Yes, I didn't want to be there.

15 Q. And why didn't you tell anybody in
16 that library that you were being held against
17 your will?

18 A. I think, because I was sufficiently
19 broken. My will was broken.

20 Q. You mean, that you actually were
21 willfully there, when you say, your will was
22 broken?

23 A. Well, if we go with the broken will
24 idiom, then we have to regroup as to against or

1 willful. If you don't have any will, it would
2 be pretty hard to be --

3 Q. So you weren't there against your will,
4 because you didn't have any will?

5 MR. TABB: Objection.

6 A. It is sort of like if you render
7 someone unconscious and, you know, are you
8 there, or --

9 Q. Were you unconscious in the University
10 of California library?

11 MR. TABB: Come on.

12 A. Yes. In a large part.

13 Q. In a large part you were unconscious
14 while you were there?

15 A. Yes, I think I was rendered to a great
16 degree unconscious throughout the whole
17 scientological story.

18 Q. But what you were doing there was
19 doing research on doctors, right, and on the
20 medical profession, right?

21 A. Correct.

22 Q. And --

23 A. A brilliant trained dog.

24 Q. And, in fact, long after that, you

1 wanted to remain in scientology, right, long
2 after 1976?

3 A. Well, I certainly did stay, I mean, I
4 stayed --

5 Q. You wanted to actually advance in
6 scientology, didn't you?

7 A. Yes. I wanted to do everything I
8 could to save this planet.

9 Q. And you wanted to make scientology
10 more successful on the planet, right?

11 A. Yes.

12 Q. And you actually petitioned for a job
13 that didn't exist, from L. Ron Hubbard, that
14 you be allowed to research his history, right,
15 that is clear, isn't it?

16 A. Yes, I did that.

17 Q. And the reason was, you filed a
18 petition asking that this job be created,
19 because the future of the planet depends on
20 scientology, you said that, right?

21 A. Yes.

22 Q. And that was in 1980?

23 A. Yes.

24 Q. And you didn't ask at any time between '76

1 and '80 to get out of scientology, did you?

2 A. No.

3 Q. And you took visits home to your
4 family during that time, didn't you?

5 A. Yes.

6 Q. How many visits?

7 A. Seven. What period?

8 Q. Let's say, '75 to '80.

9 A. '75 to '80, one --

10 Q. One visit?

11 A. -- two, three. I guess, three.

12 Q. And that was to Canada?

13 A. Correct.

14 Q. And each time you returned willingly
15 to the Church?

16 A. Well, again, you get into that subject
17 of will. I certainly came back.

18 Q. You wanted to go back, didn't you?

19 A. Yes.

20 Q. And you wanted to create a new job, so
21 that you could further scientology in 1980, we
22 have established that, right?

23 A. Yes.

24 Q. And isn't it fair to say that you

1 weren't held against your will in the
2 University of California library, but that you
3 accepted whatever your job was there as part of
4 the discipline of the group you joined?

5 A. No. I had no choice.

6 Q. Well, you could have told somebody
7 there that you wanted to leave and you were
8 being held against your will, if you wanted,
9 right?

10 MR. TABB: Mr. Blumenson, you are
11 getting argumentative. If you want information,
12 we will give you information, but we are not
13 going to argue with you.

14 Q. Did you say at the time that you wrote
15 that petition, did you say that the success of
16 scientology depends, in part, on furthering
17 purification rundowns?

18 A. I suppose. I don't have it here, but
19 I would have said that then.

20 Q. Purification rundown is helpful for
21 people who use drugs, isn't it, or supposed to
22 be?

23 MR. TABB: According to who?

24 A. Yes, it's supposed to be.

1 Q. When you said that you thought
2 purification rundown would get people off drugs,
3 didn't you?

4 A. No.

5 Q. Well, why did you say it was important
6 to further purification rundowns in 1980?

7 A. Well, that wasn't what it was even
8 stated. I mean, the way Hubbard stated it was
9 the removal of the residual effects of drugs,
10 toxins, poisons, radiation, so "get off of," it
11 wasn't used like that.

12 Q. But in 1980, you believed that the
13 purification rundown would be helpful in both
14 getting people off drugs and removing the toxic
15 effects of drugs, didn't you, when you wrote
16 this petition?

17 A. Getting people off of drugs?

18 Q. Yes.

19 A. I don't think it was used like that.

20 Q. You thought it would be useful in
21 removing the toxic effects of drugs?

22 A. That's what Hubbard said it did.

23 Q. And you believed it did, right, in
24 1980?

1 A. I don't know that there is such a
2 belief. He said it, and you didn't question it.
3 So is there a belief formed if there is no
4 cognitive procedure going on?

5 Q. Did you --

6 A. Sort of like the hypnotized subject,
7 is he believing, I don't know.

8 Q. Did you know people who used drugs
9 before they entered scientology who got off
10 drugs because of scientology?

11 A. Do did I know of any?

12 Q. Yes.

13 A. Did I know people who used drugs
14 before scientology and got off of drugs because
15 of scientology, I don't know of any.

16 Q. Well, didn't you use drugs before
17 scientology?

18 A. Yes. But I had quit before I got
19 involved in scientology.

20 Q. When did you quit?

21 A. 1969.

22 Q. The year you got involved in
23 scientology?

24 A. Correct.

1 Q. And what month did you last use drugs
2 in 1969?

3 A. I couldn't tell you.

4 Q. Have you used them since '69?

5 A. It is none of your business.

6 MR. BLUMENSON: Strike that question.

7 Q. Did you use drugs while you were in
8 scientology?

9 A. I suppose I drank a lot. I did a lot
10 of coffee, that is mainly it.

11 Q. You mean, you drank liquor a lot when
12 you were in the Church?

13 A. Yes.

14 Q. And did you drink liquor a lot before
15 you were in the Church?

16 A. Probably around the same amount.

17 Q. And do you drink liquor a lot now?

18 A. No, I don't drink at all.

19 Q. When did you stop drinking?

20 A. Well, that is not here --

21 Q. When did you basically --

22 A. Basically quit?

23 Q. Yes.

24 A. This spring.

1 Q. Okay.

2 A. I mean, I have had a couple of beers
3 since then. I had half of one or one for my
4 birthday.

5 Q. Now, you know that scientology has a
6 prohibition of using drugs, don't you?

7 A. At a certain level, yes.

8 Q. Well, isn't there a strong -- isn't
9 there a requirement that in order to be a good
10 scientologist or in order to do auditing that
11 you not use illicit drugs?

12 A. Yes, at a certain level it's true.

13 Q. And isn't it a fact, that in
14 scientology very few, if any, people do use
15 illicit drugs?

16 A. I can't talk for the others.

17 Q. But in your observation?

18 A. True.

19 Q. In fact, while you were in scientology,
20 you didn't know of anybody who used drugs, did
21 you? None of the scientologists you knew used
22 drugs, did they?

23 A. L. Ron Hubbard.

24 Q. What drugs did L. Ron Hubbard use

1 while you were in scientology?

2 A. He had the whole -- I mean --

3 Q. Did you ever see L. Ron Hubbard use
4 drugs while you were in scientology?

5 A. No. But you are asking me about --
6 you know, because I can't tell you about all of
7 the other people, but you asked me about that
8 general line.

9 Q. Okay. Let's start --

10 A. So I know that Kenneth Douglass's
11 testimony about what drugs he was using. I've
12 seen his own correspondence, where he was
13 supposedly creating OT3, and he was popping
14 pinks and grays and drinking rum.

15 Q. So apart from what you have heard,
16 this is all through hearsay? You have heard
17 through the Douglasses?

18 A. Whatever, yes. So I have seen massive
19 medical drugs which Hubbard had a lot.

20 Q. Apart from Hubbard, you were during
21 the 12 years you were in scientology, known of
22 the people you knew in scientology were using
23 illicit drugs; isn't that correct?

24 A. Well, I mean, there were some, but I

1 don't know.

2 Q. You never saw anybody or knew of
3 anybody?

4 A. I never saw anybody doing drugs.

5 Q. And you never knew of anybody who did
6 them while they were in the Church, correct?

7 A. I knew of some.

8 Q. Do you agree with Eddie Walters'
9 question, "Isn't it a fact that scientology has
10 a remarkable record turning these people around
11 and getting them off drugs? Answer: Yes, I
12 think it is the best of any practice probably
13 in the world."

14 Do you agree or disagree with that
15 statement of Eddie Walters?

16 A. I disagree.

17 Q. Why is that?

18 A. Because it is not the best. It is
19 just not the best practice there is.

20 Q. Well, it does have a program to get
21 people off drugs; isn't that correct?

22 A. You mean, Narconon?

23 Q. Narconon, and also its moral rules.
24 It has rules against drug taking, doesn't it?

1 A. Yes.

2 Q. And it also has Narconon, which you
3 just said?

4 A. Yes.

5 Q. And isn't it a fact that I has a
6 remarkable record of getting people off drugs,
7 true?

8 A. I don't know. And I doubt it.

9 MR. TABB: Can we break for five
10 minutes.

11 MR. BLUMENSON: Yes.

12 (Brief break)

13 MR. BLUMENSON: Now, back on the
14 record.

Q. When you first became
15 acquainted with scientology, you had been off
16 drugs for a matter of days or weeks; isn't that
17 true?

18 A. Yes. I can't tell you the exact time.

19 Q. But you are sure it was days or weeks
20 before, rather than after?

21 A. What?

22 Q. That you stopped using drugs, days or
23 weeks before becoming acquainted with
24 scientology --

1 A. Yes.

2 Q. -- rather than after becoming
3 acquainted with scientology?

4 A. What?

5 Q. Well, you used drugs in the period
6 before you became acquainted with scientology,
7 illicit drugs?

8 A. Before I took any course, you know,
9 you are talking about when, this summer?

10 Q. The summer of 1969, right?

11 A. So some months before I took any
12 course, I had not done any drugs.

13 Q. Prior to that time, you had used
14 various kinds of illicit drugs, correct?

15 MR. TABB: He stated that, Erick.

16 Q. And those included LSD, didn't they?

17 MR. TABB: Objection.

18 MR. BLUMENSON: What is the objection?

19 MR. TABB: What is the relevance of
20 what drugs he used before he stopped we are not
21 going to get into this.

22 MR. BLUMENSON: The relevance is,
23 first of all, scientology -- other witnesses,
24 including hostile witnesses, like, Eddie

1 Walters has said scientology has a great record
2 of getting people off drugs, and it may have
3 had that effect in Gerald Armstrong's case, and
4 we would submit it did. Secondly,
5 any damages that he claims, mental damages he
6 claims, maybe due to a variety of factors. He
7 says that all of his damages are due to
8 scientology. I would say that people with a
9 record of LSD use may have other reasons for
10 those mental damages.

11 And thirdly, he says that -- well, I
12 will go into some other reasons as I get some
13 more questioning in.

14 MR. TABB: As you come up with some,
15 is that it?

16 MR. BLUMENSON: No. I mean, there are
17 plenty of other things. There is a viable
18 aspect in terms of whether he is proselyting
19 for Timothy Leary, for example, the LSD guru,
20 and whether he used or uses LSD, obviously is
21 relevant it is probative on the issue of
22 whether he might or might not be proselyting
23 for Timothy Leary.

24 I mean, there are countless reasons,

1 but I think the most -- and they all make it
2 obviously relevant, but, I think, the most
3 obvious or primary reason is that our position
4 with Gerald Armstrong, as with almost everybody
5 else who has been in scientology, is that one
6 of the benefits that scientology produced was
7 getting him off drugs or keeping him off drugs.

8 And that the other aspects also goes
9 to his motivation for joining, and it also goes
10 to the reason for any damage that he alleges.
11 And all of those things, I think, are pretty
12 obvious.

13 A. You know, just to counter, you know,
14 to put that in perspective --

15 MR. GELLER: Excuse me. There is not
16 a question on the floor.

17 THE WITNESS: How interesting.

18 MR. BLUMENSON: Go ahead. Put it in
19 perspective, so that I can understand the terms
20 of this debate more clearly. I mean, if you
21 want to say something --

22 MR. TABB: Can I confer with my client.

23 MR. BLUMENSON: If you want to put
24 your position on the record, you may.

1 THE WITNESS: You claim that -- and,
2 of course, you know because it is all P.C.
3 Folder information, and the client knows,
4 because it is all P.C. Folder information, if
5 they are claiming that an individual is
6 psychologically damaged because of drugs, then,
7 surely, it makes it even more egregious, the
8 acts taken against someone who you already know
9 by your own definition is mentally, emotionally,
10 psychologically impaired. So if you want to
11 follow down that avenue --

12 MR. TABB: I would like a moment with
13 my client, and I will be right back.

14 (Brief break)

15 MR. TABB: After conferring with my
16 client, Mr. Armstrong, it is my understanding
17 that there is not a fraud claim or regarding
18 that scientology would cure drug usage is
19 completely outside of the scope of the
20 deposition. It is outside of the scope of the
21 outline, which your counsel said would be the
22 outline for this scope of this deposition.

23 I will let you ask the questions and
24 get answers; however, my objection is going to

1 be noted and if at some time we feel that this
2 deposition has just gone on for too long, we
3 are going to cite this as immaterial and
4 counsel's attempt to go outside the record.

5 MR. BLUMENSON: Okay. That is an
6 absolutely fair resolution of this, and then it
7 will be up to the judge to decide whether I am
8 being abusive by asking these questions, and
9 you're correct, or if these questions are
10 relevant for the reasons I said. And I think
11 that is a fair way to proceed.

12 BY MR. BLUMENSON:

13 Q. By the way, well, let me go to the
14 question then, what drugs did you use in 1969
15 or prior to your joining the Church, what
16 illicit drugs?

17 A. Well, you know, I never really joined
18 the Church, but you are talking about getting
19 involved with scientology, and I have it all
20 answered, but it definitely is over both my
21 objection and my dead body, because it is all
22 preclear folder information, and you guys have
23 already obtained it illegally, falsely and so
24 on.

1 MR. TABB: You answered the question.

2 A. Are you hoping that I will waive
3 everything. Without waiving anything, without
4 waiving my free standard privilege, if there is
5 such a beast.

6 Q. Yes.

7 A. So I did -- let me think -- marijuana,
8 LSD, something that may have been psychedilic,
9 something that may have been mescaline. I
10 think that's it.

11 Q. Did you ever use hashish?

12 A. Yes.

13 Q. Did you ever use barbiturates?

14 A. Barbiturates, well, it's possible that
15 some drug of some sort, some pill of some sort
16 that was given to me by --

17 MR. TABB: If you remember, Gerry, say
18 you don't.

19 A. -- by a psychiatrist. It could have
20 been barbiturate.

21 Q. What year would that have been around,
22 1964?

MR. TABB: Was that a
23 question or an answer.

24 Q. Would that have been around 1964?

1 A. Around.

2 Q. Okay.

3 A. I think, probably, maybe a year
4 earlier.

5 Q. Do you know about how many times you
6 used marijuana, would it have been over 20?

7 A. Yes, I would say over 20.

8 Q. Would you say it was around 50?

9 A. You guys have got a record of it there,
10 you know, and whatever my best recollection was
11 I'd say 50, why not.

12 Q. Okay. And that would be true about
13 hashish also, about 50 times?

14 A. I'm not sure. I couldn't tell you. I
15 couldn't hazard a guess. It seems to me that
16 hashish was less.

17 Q. Did you say you had used MDA or not?

18 A. Did I say it? I don't think I said it
19 now.

20 Q. Did you?

21 A. That's methylene dioxyamphetamine, or
22 something like that, yes, maybe a couple of
23 times.

24 Q. And did you say you used mescaline?

1 A. I believe I did.

2 Q. And isn't it a fact that you used
3 those drugs marijuana, hashish, LSD, and
4 mescaline on numerous occasions ending in June
5 or July 1969?

6 A. When you say, "numerous occasions," do
7 you mean all at the same time?

8 Q. No. At various times, but none of
9 them ending before June or July 1969?

10 A. You are making no differentiation
11 between those drugs?

12 Q. I will break it down, if you want.
13 Isn't it a fact that you stopped using
14 marijuana in July 1969?

15 A. Sometime in 1969.

16 Q. Does July 1969 sounds about right?

17 A. I stopped using them all.

18 Q. And isn't it true that you used LSD
19 into June 1969?

20 A. I don't have a recollection of it.

21 Q. Okay. You were required to file out
22 your drug history for various forms including
23 personnel application forms, isn't that correct,
24 scientology requires that information for a

1 personnel applicant, right?

2 A. Well, my recollection is I filed it
3 out for -- there was a G.O., application, I
4 believe, probably in 1975, and that's an
5 application for the guardians office. And
6 there was another one, I believe, in 1977, and
7 that was required for posting at the special
8 unit.

9 Q. And showing you this page of what I
10 understand to be a personnel application form
11 for the G.O., if you would look at that
12 question concerning drug history, does that
13 refresh your recollection as to when you took
14 the various drugs?

15 A. (Reading document) Oh , so there you
16 got it.

17 Q. That's what I am relying on asking
18 these questions, by the way.

19 A. Okay.

20 Q. Do you recall writing down that
21 information?

22 A. No, but it looks like mine, so I
23 couldn't tell you where or -- what are you
24 representing that this is?

1 Q. A personnel application form for the
2 G.O.

3 A. For 1975?

4 Q. Yes. That's when you applied for the
5 G.O., right?

6 A. Yes.

7 Q. That's right. So you recognize this
8 as accurate?

9 A. Well, I recognize that possibly is a
10 page off that form for which I answered
11 questions in 1975.

12 MR. BLUMENSON: Okay. And can we have
13 this marked as Exhibit 1 for the Defendant.

14 (Document marked as Exhibit 1
15 for identification)

16 Q. Okay. So showing you Exhibit 1, you
17 have no quarrel with the amounts or dates of
18 the particular drugs that are listed in answer
19 to Question 10?

20 A. Again, I have a quarrel with the whole
21 thing, yes.

22 Q. But, I mean, you don't see anything
23 inaccurate?

24 A. It was obtained falsely.

1 Q. You don't see anything falsely about
2 the dates or the amounts, do you?

3 MR. TABB: He has previously testified
4 that he used hashish less than that has
5 indicated 50 times.

6 Q. Okay. The dates seem accurate to you?

7 A. I don't know of any -- I can't say for
8 sure that there is any problem.

9 Q. Okay.

10 A. But, yes, that is the barbiturates,
11 right, okay. So it's pretty accurate.

12 Q. And it was in June or July of 1969
13 that you became introduced to scientology,
14 that's correct, right?

15 A. Yes. Whenever it was.

16 Q. And is it fair to say --

17 A. You mean, the first time I heard about
18 scientology?

19 Q. The first time that you started
20 reading or the first time you went in the doors
21 of the Church or mission was the summer of '69,
22 right?

23 A. Yes, August, something like that.

24 Q. Didn't you say ealier July or August?

1 A. Yes. Sometime --

2 Q. Sometime about simultaneous after the
3 end of this drug, use entered scientology;
4 isn't that correct?

5 A. No. I had stopped taking drugs before
6 I entered the portholes of scientology.

7 Q. Yes. But in any case, it was about
8 the same month, July of 1969?

9 MR. TABB: Mr. Blumenson, we have been
10 over this again and again.

11 MR. BLUMENSON: Well, can I get an
12 answer. I will move on as soon as I do.

13 MR. TABB: You've got an answer.

14 Q. Am I correct?

15 MR. TABB: No, Mr. Blumenson, the
16 record speaks for itself.

17 A. Listen, I have no scientology
18 processing. I have taken no scientology
19 courses. I have not spoken to a scientology
20 staff member. I have done nothing relative to
21 scientology, and I quit.

22 Q. All right. You had quit using
23 marijuana 50 times and LSD and so on during the
24 same summer that you entered scientology, we

1 have established that much, right? It will go
2 faster if you answer the question.

3 MR. TABB: It will go faster if you
4 don't keep repeating questions. Please ask
5 your next question.

6 MR. BLUMENSON: I want that in a clear
7 form.

8 MR. TABB: It's been answered.

9 MR. BLUMENSON: Shall we stipulate
10 that the answer is yes, then? I just want to
11 go on, but I do not think it is clear on the
12 record.

13 A. I don't stipulate that the answer is
14 being yes, because I don't know what the
15 question is.

16 Q. The question is --

17 A. But I will reiterate whatever I have
18 said before.

19 Q. All right. All I want to know is --

20 MR. TABB: He stated that he quit
21 drugs before he went into scientology.

22 A. Did scientology get me off drugs with
23 any technology, with any drug rundown, no, it
24 didn't.

1 Q. Did it keep you off drugs?

2 A. No.

3 Q. Did you use LSD, marijuana, hashish,
4 MDA, or mescaline during the 12 years that you
5 were in scientology from 1969 to '81?

6 A. No.

7 Q. Did you use any of those drugs after
8 you left scientology?

9 MR. TABB: It is irrelevant to the
10 case.

11 MR. BLUMENSON: It is not irrelevant.
12 I think there is a very clear implication here
13 and it is quite probative, if he was using
14 drugs to a great extents before and if he was
15 using drugs after, and wasn't for 12 years
16 while he was in scientology. I think there is
17 a very big implication that scientology did
18 solve some of his mental or physical problems.

19 MR. TABB: There is no problem about
20 drug abuse, and we are not going to answer
21 questions after --

22 MR. BLUMENSON: Mike, there is a claim
23 that scientology fraudulently represented it
24 would help physical or mental problems,

1 relationships, various other things. And the
2 use of drugs obviously bears on whether they
3 were mental problems or not, or whether they
4 were physical problems or not.

5 I think that if somebody is using a
6 lot of drugs a jury could find it is because
7 they have serious problems. And somebody
8 getting off drugs is because there's been
9 enumerations in their life. I think it is
10 highly probative.

11 MR. TABB: I think it is beyond the
12 scope of the deposition, and we not going to
13 answer. And I take that stand right now, and I
14 am not going to change my mind.

15 MR. GELLER: Look at 2D on Page 5,
16 please.

17 MR. TABB: I don't believe I have my
18 copy back.

19 MR. GELLER: Yes, you do.

20 MR. BLUMENSON: You mean, D2?

21 MR. TABB: "D2, impact on Mr.
22 Armstrong's strength and activity. He has
23 never claimed that scientology had anything to
24 do with making him go back on drugs or go on

1 drugs at all."

2 MR. BLUMENSON: What D is injuries to
3 Armstrong whether he was injured to his house,
4 whether there was impact on his strength and
5 activity, whether there was any shock or
6 emotional or physical distress that he suffered
7 due to scientology.

8 And I think that getting off drugs,
9 obviously, is on the good side of the scales
10 and it is probative as to other aspects of
11 strenght, activity, emotional or physical
12 well-being.

13 MR. GELLER: Just his getting back on
14 drugs afterwards is probative of whether the
15 damages are resulted from his period in
16 scientology or whether the damages result from
17 whatever.

18 MR. TABB: Mr. Armstrong is not
19 claiming his experience with scientology got
20 him back on drugs. He is not even claiming
21 that he got back on drugs. We are claiming any
22 use as irrelevant, and we are protected by the
23 Fifth Amendment, and we are not going to answer.

24 MR. BLUMENSON: Well, take the Fifth

1 Amendment, if you want, that is perfectly
2 properly.

3 MR. TABB: I am not taking the Fifth
4 Amendment. I am saying it is irrelevant, and
5 you are going to have to go to the judge on
6 that. We take our stand.

7 MR. BLUMENSON: Okay. I am going to
8 reframe from asking any questions about his
9 drug use after leaving scientology.

10 MR. TABB: Okay.

11 MR. BLUMENSON: And we will leave that
12 for the court. I think it is highly relevant.

13 MR. TABB: We'll see.

14 BY MR. BLUMENSON:

15 Q. Now, the personnel application form
16 was not part of the auditing process, correct,
17 filling out the personnel application form does
18 not take place during an auditing session;
19 isn't that correct?

20 A. Correct.

21 Q. And there were no promises made to you
22 about this being part of auditing or being
23 confidential, correct?

24 A. Incorrect.

1 Q. Well, the personnel application form,
2 you knew, was going to be looked at by the G.O.,
3 right?

4 A. Yes.

5 Q. And you knew that it was available to
6 any one in the G.O., in terms of whether you
7 should be hired for the job or not; isn't that
8 right?

9 A. Okay.

10 Q. And when you filled this out, you did
11 not think it came within any confidentiality
12 code?

13 A. Absolutely.

14 MR. TABB: Absolutely that it did not,
15 or absolutely that it did?

16 THE WITNESS: Absolutely that it did.

17 Q. What code would that be, was there a
18 code that you are citing, was that the
19 auditor's code?

20 A. You are talking about confidentiality?

21 Q. Yes. You say that this personnel
22 application form, was confidential. Was it
23 confidential because of the auditor's code?

24 MR. TABB: Off the record.

1 (Discussion off the record)

2 A. No. I think it was confidential
3 because of, in part, of the auditor's code,
4 because the auditor's code kind of sets it up
5 for making that type of information available
6 to anyone. So that's how it's initiated,
7 beginning with the auditors code, beginning
8 with the representations of confidentiality
9 during auditing.

10 Q. But this was not during auditing, we
11 have established that?

12 A. You don't want to hear the rest of my
13 answer?

14 Q. Well, I am just trying to get to the
15 nub of this, this personnel application form.

16 A. Well, that's what I am trying to
17 explain to you.

18 Q. Well, have you applied for any other
19 jobs?

20 A. Yes.

21 Q. And did you fill out personnel
22 application forms for those jobs?

23 A. Yes.

24 Q. And did you think somebody would read

1 those forms?

2 A. Yes.

3 Q. Do you think they are covered by the
4 auditor's code, as well?

5 A. I am not sure about -- you mean, the
6 other scientology organizations that --

7 Q. No. Did you believe, when you applied
8 to -- A. The Scottish Highland Club.

9 Q. All right. Did you believe, when you
10 applied to the Scottish Highland's Club or
11 wherever else, did you believe that that form
12 would be confidential, the personnel
13 application form?

14 A. Well, on the other application forms --
15 first of all, I think everyone wherever I have
16 filled out such a form, none of those
17 organizations had the benevolent intent of
18 destroying me.

19 Q. I didn't ask that. I asked whether --

20 A. So it is different.

21 Q. I asked whether, when you filled out a
22 personnel application form for any of these
23 other jobs that you applied to since leaving
24 scientology whether you understood that they

1 were bound by some pledge of confidentiality?

2 A. The issue has never come up.

3 Q. Okay. On what basis do you say that
4 this personnel application form or what code
5 made it confidential?

6 A. Well, to begin with, the auditor's
7 code, in which, all of this information comes
8 out.

9 Q. This did not come out in auditing,
10 right?

11 A. It is all from auditing.

12 Q. You filled this out, outside of a
13 session, right?

14 A. All of that data --

15 Q. You said it in auditing, perhaps?

16 A. I said it in auditing.

17 Q. But you also said it outside of
18 auditing on the personnel application form?

19 A. That's right. So those suckers --

20 MR. TABB: Gentlemen, lets try to calm
21 down.

22 A. So those guys set you up by obtaining
23 these statements in auditing, you are fattened
24 up with the representation that "it is all

1 confidential and we are here to help you." So
2 you give them in that one context, and it sure
3 becomes a lot easier later in another context,
4 and not only that, but they have got it all, so
5 you better put it down here, so they will cross-reference
6 it, and they will find --

7 Q. In 1975?

8 A. So, yes. So the original obtaining of
9 this information was done fraudulently, the
10 subsequent utilization of this information was
11 done fraudulently; both, because of the
12 manipulation which is done on you, so that you
13 divulge it originally and set you up for
14 divulging it in another context.

15 In addition, there is the promise that
16 the organization, you know, "you can trust us," you
17 know, "your trust had been violated in the past,
18 and this is just a personnel form." You don't
19 know that when you find out that you have been
20 ripped off, that this thing (indicating) is
21 suddenly not a personnel form at all, but
22 becomes something which can be used against you.

23 Q. All right. Now, did anyone make you
24 apply to the G.O., and fill out a personnel

1 application form or was that your own idea?

2 A. It was their rule.

3 Q. Well, did anyone make you apply to the
4 G.O.? A. No one made me apply.

5 Q. You decided you wanted to be in the
6 G.O., correct?

7 A. Yes. I was, basically, already in the
8 G.O.

9 Q. And you wanted to apply for an
10 official position in the G.O., right?

11 A. Correct.

12 Q. And therefore you decided to fill out
13 a personnel application form, which was the way
14 you apply for a job in the G.O., correct?

15 A. Correct.

16 Q. And one of the things that you did was
17 put down all of the drugs that you had taken on
18 the personnel application form, correct?

19 A. They are there in front of you.

20 Q. Right. And one of the reasons that it
21 is important -- It is important, isn't it, in
22 scientology or at least to scientologists, rank
23 and file scientologists, that people not be
24 using drugs while they are at work; isn't that

1 correct?

2 A. I don't know whether it is important
3 to the rank and file scientologists.

4 Q. But isn't there a rule?

5 A. There is a rule, yes.

6 Q. And isn't there also some sense in
7 scientology that if you used drugs before you
8 entered scientology that you are going to have
9 real problems unless you have a purification
10 rundown to remove the effects of it?

11 MR. TABB: What time period are you
12 talking about?

13 MR. BLUMENSON: 1975.

14 A. A purification rundown had not been
15 created at that time.

16 Q. All right. Some kind of a processing
17 to remove the effects of drugs?

18 A. The latest, whatever it was at that
19 time, the money maker, the drug rundown, the
20 hours of auditing.

21 Q. And when you fill out a personnel
22 application form that you used drugs, doesn't
23 that mean that you are going to have to take
24 some kind of processing to reverse the effects

1 of drugs?

2 A. I already had taken that.

3 Q. And that was the drug rundown, isn't
4 it? A. How interesting.

5 Q. You had taken the drug rundown, right?

6 A. Right.

7 Q. And you took that in April 1975, right?

8 A. Right.

9 Q. And was that one of the reasons, that
10 you could get a job with the G.O.?

11 A. Well, I don't know. April '75?

12 Q. Right.

13 A. You know, the drug rundown is
14 something that everybody gets. It's, you know,
15 I don't know how many people apply, but
16 everybody gets it.

17 Q. Okay. So if you want to stay in
18 scientology, you would be expected to take the
19 drug rundown, correct?

20 A. Whatever is ordered. Everyone does
21 the drug rundown. These two birds here have
22 done the drug rundown.

23 Q. Why is everybody expected to take the
24 drug rundown, is drugs an important issue in

1 scientology?

2 A. Well, as near as I can understand why
3 everybody has to take the drug rundown is to
4 give them leverage later on, so that if you
5 ever deviate and if you ever question Hubbard
6 and if you ever leave the organization and if
7 you ever intend to uncover the fraud, they have
8 got leverage.

9 Q. Well, when you took the drug rundown,
10 did you pay for it?

11 A. I am paying for it now. But in terms
12 of dollars?

13 Q. In terms of dollars, right.

14 A. No.

15 Q. And when you say you are paying for it
16 now, you or not saying that the drug rundown
17 got you back on drugs, are you?

18 MR. TABB: He never stated that he is
19 back on drugs.

20 A. When I say, "I am paying for it now,"
21 I am saying that the fact that I was foolish
22 enough to be duped in to trust those people, to
23 trust Hubbard, that fact, the fact that you
24 have in front of you a list of drugs that

1 Gerald Armstrong took in 1967 through '69,
2 that's what I am paying for. I am paying for
3 the fact that I trusted L. Ron Hubbard.

4 Q. Are you saying that you are paying for
5 having taken the drug rundown, in particular?

6 A. Well, out of the drug rundown, of
7 course, you have all of the drugs, you have got
8 that list, that's in front of you.

9 Q. Well, do you believe that you were
10 harmed by the drug rundown?

11 A. I don't believe I have ever said that
12 I was harmed by the drug rundown.

13 Q. Were you?

14 A. I am harmed by it now, yes. I am
15 harmed by all of scientology auditing, by every
16 session, by every time I picked up the cans, I
17 am right now feeling the effects and the harm
18 from that.

19 Q. And so you are saying the answer is,
20 yes, you were harmed by the drug rundown, along
21 with other things?

22 MR. TABB: The record speaks for
23 itself, Counselor.

24 MR. BLUMENSON: Well, he is not that

1 clear on this answer.

2 Q. You say you are still paying for the
3 drug rundown. I want to know, specifically, if
4 you believe that drug rundown was harmful to
5 you.

6 MR. TABB: He answered the question.

7 A. I answered the question.

8 Q. I don't believe so.

9 A. Okay. Then I will say the harm, which
10 comes from the whole scientology auditing, not
11 differentiating between --

12 Q. All right. But I am asking about that
13 particular event. Your taking the drug rundown
14 in
15 '75, do you believe that that was a harmful
16 thing for you to do?

17 A. It was completely destructive to me.

18 Q. Why was the drug rundown, in
19 particular, destructive to you?

20 A. I never said, "in particular."

21 Q. Well, as distinguished from other
22 things, you say they all are harmful. I want
23 to know why that particular course, the drug
24 rundown, created any harm or damage to you?

1 A. As I say, every session, those were
2 specifically on the subject of drugs. The
3 auditing process was used to control, to keep
4 people in the organization, to stop them from
5 questioning, to stop them from figuring out
6 what was going on. That's harm, but more
7 importantly, all of those things, wherein, you
8 were supposedly unburdening yourself, getting
9 to the basis of it, figuring out, you know,
10 cognitions about life and living.

11 Those things were incredibly
12 destructive because of the intent of the
13 organization, why they retained all of that
14 material and it's exemplified by the 1986
15 culling of my preclear folders.

16 Q. You were told in 1975 what the drug
17 rundown was for, weren't you?

18 A. I suppose so.

19 Q. And it was to keep you off drugs and
20 reduce the toxicity or eliminate toxicity from
21 your body, isn't that true, isn't that what you
22 were told?

23 A. No, I wasn't told that.

24 Q. What were you told its effect would be

1 with regard to drugs?

2 A. Well, I have to get exactly what the
3 promise in phenomenon of the drug rundown is,
4 but my recollection is that the subject of
5 toxins never came up until approximately 1977, '78,
6 when Hubbard created what originally was the
7 LSD program and later he renamed or someone
8 renamed a purification rundown of toxins.

9 MR. GELLER: Off the record.

10 (Discussion off the record)

11 Q. Did you have some brothers and one
12 sister; am I correct?

13 A. Correct.

14 Q. And will you tell me -- well, we will
15 start with what the names and ages of your
16 siblings are.

17 A. James, Andrew, Rosalie, Anthony. 43,
18 42, 38, 34.

19 MR. TABB: For the record, I am going
20 to state that Mr. Armstrong and his
21 relationship with his family is another matter
22 that is not in the scope of the outline. If
23 you continue in your own --

24 MR. BLUMENSON: Do you stipulate that

1 this disconnect is not a part of this lawsuit?

2 MR. TABB: I am not in a position to
3 stipulate. I don't believe it was specifically
4 named in the complaint, but I am not in the
5 position to stipulate.

6 THE WITNESS: I don't think it is in
7 the complaint, and I don't think I ever --

8 MR. TABB: I am only stating for the
9 record for your own protection, Mr. Blumenson,
10 it is not an area that is in the --

11 MR. BLUMENSON: Let's eliminate it
12 from the case.

13 MR. TABB: You go at your own peril.

14 MR. BLUMENSON: Let's eliminate it
15 from the case.

16 Q. Were you ever ordered disconnected?

17 A. I don't --

18 MR. TABB: I stipulate to the --

19 MR. BLUMENSON: I am asking him as to
20 the fact.

21 A. I don't believe so.

22 Q. Okay. And you maintain contact with
23 your parents and your siblings throughout the
24 period you were in scientology however sporadic

1 basis, correct?

2 A. Yes. I never disconnected with any of
3 them.

4 Q. You wrote letters back and forth?

5 A. Yes.

6 Q. And you visited them?

7 A. Yes.

8 Q. Now, did you ever try to interest any
9 of your siblings or your family in scientology?

10 A. In the early days.

11 Q. Okay. Did any of them become
12 interested?

13 A. Yes. Well, yes.

14 Q. Who?

15 A. I had two of them involved. My
16 younger brother and my younger sister.

17 Q. Anthony and Rosalie?

18 A. Correct.

19 Q. And did any of them join for any
20 period of time?

21 A. I don't -- Well, they became involved.
22 You are talking about joining --

23 Q. How seriously involved? Can you tell
24 me, was Rosalie taking courses?

1 A. She may have.

2 Q. Did she work on staff?

3 A. I don't believe so, but I don't know.

4 Q. How about Anthony, did he take courses?

5 A. Yes. In fact, he did Dianetics. He
6 did the communications course and the Dianetics
7 course with me.

8 Q. And did he work on staff?

9 A. He did something for -- and I don't
10 know if he was technically on staff or if it
11 was voluntary work, but something. He
12 definitely helped around the franchise. When I
13 was involved, occasionally, he would show up,
14 and my recollection is that he did something
15 afterwards, and I don't know specifically what.

16 Q. And approximately how long was Anthony
17 involved with scientology?

18 A. Maybe a couple of years sporadically,
19 and I don't know, again, to what degree.

20 Q. Did he ever denounce it?

21 A. I'm pretty sure.

22 Q. You don't know for sure?

23 A. Well, you know, when you denounce or
24 abandoned, I guese, I don't know to what degree

1 he was in, whether or not you would make that
2 kind of a giant leap, but he is certainly not
3 involved in it any more.

4 Q. What does he do for a living now?

5 A. He is an electrician.

6 Q. Is he married?

7 A. I don't believe so.

8 Q. How about Rosalie, what does she do
9 for a living?

10 A. She is a secretary or something like
11 that.

12 Q. Is she married?

13 A. No.

14 Q. What about Andrew, what does he do for
15 a living?

16 A. He is a geologist.

17 Q. And what about James?

18 A. He is an accountant of some sort. I
19 don't know.

20 Q. When was the last time you were in
21 contact with James?

22 A. Direct contact, spoke to him?

23 Q. Yes.

24 A. You know, if I spoke to him in the

1 last three years, it may have been by phone.
2 If he was at my parents place when I called, so
3 that is the amount of the contact. I saw him
4 perhaps in 1982, maybe, after leaving the
5 organization I may have seen him once.

6 Q. In 1982, when you left, did you talk
7 to him about what happened to you in
8 scientology?

9 A. I doubt it, no.

10 Q. Did you tell anyone in your family
11 that you were held captive in scientology?

12 A. It very easily could have come up in
13 one conversation or another.

14 Q. Do you have any recollection of ever
15 saying it to anyone in your family?

16 A. I don't know.

17 Q. What does your father do now, does he
18 work?

19 A. No.

20 Q. When did he stop working?

21 A. I don't know.

22 Q. Could it have been five years ago?

23 A. Yes, it could have been. I don't have
24 an exact date, even a year.

1 Q. What is James' address?

2 A. I don't know.

3 Q. Do you know any of your siblings'
4 address?

5 A. Well, I may know some of them.

6 Q. Which ones?

7 A. Some of them?

8 Q. Which ones do you know?

9 A. I don't know any of them off of the
10 top of my head.

11 Q. Well, which ones would you have?

12 A. I think I could probably get them all,
13 but I don't think I should.

14 Q. Are you going to refuse to produce
15 them?

16 A. Yes. You know, I mean, I don't want
17 to, but you guys are going to get them anyway,
18 but it just seems horrible, it's like, you know,
19 I don't want to subject them to that, so it's
20 just improper.

21 Q. So you are going to refuse to answer
22 whether you know or not what those addresses
23 are?

24 A. Well, I don't know right now what they

1 are.

2 Q. Where does your father live?

3 A. Chilliwack, British Columbia.

4 Q. Is he at home?

5 A. Well, I can't say for sure. He's been
6 in the hospital for -- I guess he was in for 10
7 days, which I knew about probably a week ago.
8 I don't know what the current situation is, but
9 he was in the hospital at the time, and he had
10 been in there for about 10 days, a guess.

11 Q. How did you hear that?

12 A. I talked to my mother.

13 Q. And how long ago?

14 A. Well, let me say, I mean, I talked --
15 well, the last time I talked was probably a
16 week ago, at which time I knew that he had been
17 in several days, and when I say, "10," it could
18 have been a week, it could have been 14, but
19 when I first learned was, I think, the day when
20 he went in and that was also through a
21 conversation with my mother.

22 Q. Do you know what the reason was?

23 A. He's got internal problems. I don't
24 know exactly what they all are, and I have not

1 talked about it, you know, in medical terms. I
2 know that there are internal problems. I know
3 that there are some real serious problems. I
4 know that he is in real rough shape, and that's
5 all I know.

6 Q. You described yourself in a deposition
7 as a fairly disturbed kid, do you recall that
8 testimony?

9 A. Well, I don't recall --

10 MR. TABB: Are you talking about his
11 past or his present?

12 MR. BLUMENSON: His past prior to
13 scientology.

14 A. I don't recall the deposition. I
15 don't recall the testimony, but it is a fairly
16 accurate statement about Gerald Armstrong in
17 his youth, yes.

18 Q. Can you give us --

19 A. I mean, not, you know, qualified, not
20 disturbed in the same way as what's his name
21 Hubbard is disturbed, that is disturbed.

22 Q. What way would Gerry Armstrong have
23 been disturbed?

24 A. Well, I was much more kind of the

1 effect of disturbance rather than the causation.

2 Q. Who caused it, this is prior to
3 scientology?

4 A. I don't know, life and livingness. I
5 don't know exactly what, you know, it was not
6 the easiest of times, but what is? Right now
7 you are talking about --

8 Q. What did you mean when you said you
9 were the cause or the effect, what was the
10 manifestation of the disturbance, why do you
11 say you were disturbed in, let's say, 1967
12 through '69, that period of time?

13 A. I was confused. I was unhappy. I was --
14 there was really, you know, there was no one up
15 to that time that I could talk to, that I did
16 talk to, in terms of, you know, being able to
17 explain what the fuck is going on. Pardon my
18 French there. So I suppose relative to what my
19 life could have potentially been, I guess, I
20 was unhappy, I was confused. It wasn't a good
21 time.

22 Q. Were you lonely?

23 A. I was lonely as heck.

24 Q. And you said in a deposition you felt

1 unworthy, this is in 1967 through this period,
2 I am talking about?

3 A. What deposition?

4 Q. I think it was the Shay deposition.

5 A. You will have to give that that in a
6 minute, but you weren't happy then and you are
7 not happy now, that's fair to say, correct?

8 A. Now, you know, you are looking, when
9 you are doing that, you are taking huge
10 stretches of time.

11 Q. I understand. Let me rephrase the
12 question.

13 A. No. Let me just, you know --

14 Q. Okay.

15 A. You want to link it up so that it
16 works, but time is not that way. Time is like
17 a segment and it is all divided up, so that I
18 could be one minute, terrified; the next minute,
19 the terror could be replaced with something,
20 right? So it is not 24 hours a day terror. It
21 is not 24 hours a day unhappiness.

22 Q. You are talking about present time?

23 A. Yes. And you know, we can cover any
24 time you want to cover the same way.

1 Q. You mean, you are also talking about
2 pre-scientology years?

3 A. Well, let's take now, and then we will
4 take then. If you want to work on percentages
5 of time, like, okay, you are happy and you are
6 unhappy.

7 Q. I would like to withdraw the question
8 and as a favor to both of us, because it will
9 expedite things without having to go --

10 A. I am trying to explain --

11 Q. I know that you are giving me your
12 best answers, and the only reason I say, "it
13 will expedite things in favor of both of us,"
14 is just because it may require a lot more time
15 in description that will delay the end of this
16 deposition. And I don't mean to belittle the
17 answer at all, but I have my need to get out
18 this data as best as I can, so that we can
19 leave. Do you understand me?

20 A. We could leave even without getting
21 out the data, but you go ahead.

22 Q. Well, I have a job to do. Okay. Did
23 you have friends when you were in scientology
24 or what you considered friends when you were

1 there?

2 A. Yes.

3 Q. And who were some of those people, who
4 would be considered some of your closest
5 friends during that period?

6 A. You don't care from what --

7 Q. Well, lets take the later period, like, '79
8 and '80?

9 A. '79 through the time I left, who was
10 more or less close?

11 Q. Yes.

12 A. Andre Clavel, Jocelyn.

13 Q. That is your former wife?

14 A. Yes.

15 A. Chuck Adams, Charles Frederick Adams,
16 I guess, I was pretty close to Dick Sullivan.
17 I guess, you know, in a way, Laurel, you know,
18 we did things together.

19 Q. Laurel Sullivan?

20 A. Laurel Sullivan. I think, Jim
21 Pedigrew was kind of friendly there. Who else?
22 Ed Brewer. Is that enough?

23 Q. Would you consider yourself to have
24 been a close friend of Lisa Bristowich?

1 A. Not in the same way that I was -- she,
2 you know, we joked around. I was probably
3 closer to her daughter than I was to her.

4 Q. What's her name?

5 A. I don't know.

6 Q. How old was she?

7 A. She was real tiny.

8 Q. Under 10?

9 A. Yes.

10 Q. And were you close to Barbera Ducell?

11 A. Yes, I think I was pretty close to
12 Barbera. I don't know, you know, closeness.

13 Q. Who would your close friends now be?

14 A. At this time?

15 Q. Yes.

16 A. Oh, I guess, you know, the closest
17 friends I have here in Boston --

18 Q. Well, I am not restricting it to
19 Boston, but we will start there.

20 A. In Boston, would be the people in the
21 office. I really don't have, you know, I have
22 sort of a kind of a sweetheart in a way, but
23 that is a whole different subject.

24 So, I guess, the people in the office,

1 in terms of friends, is really about it here in
2 Boston. And then outside of here, we have got,
3 oh, Jocelyn, I guess, Laurel. Who else? The
4 Douglasses, Nancy Rodes, Jim Dincalci. Tom
5 Mcpherson, I guess. I am pretty close with Tom.

6 Q. Any others, currently?

7 A. That's what comes to mind.

8 Q. These are the people that you could
9 rely on or who could rely on you?

10 A. Oh, no. There are a lot of people
11 that could rely on me, if that is what you are
12 looking for.

13 Q. How about people that you could rely
14 on.

15 A. Who I could rely on? So not
16 necessarily what you earlier called, "close
17 friends," but people that I could rely on?

18 Q. Okay. Wait a second. What you just
19 gave me was a list of your close friends?

20 A. Yes. You know, I don't know how many
21 you want, but we can --

22 Q. Well, are there any others that come
23 to mind?

24 A. Close friends?

1 Q. Yes.

2 A. That's what comes to mind right now.

3 Q. And you said you have a sweetheart in
4 Boston. Well, without going into her name, you
5 mean by that you have a romantic relationship
6 with someone?

7 A. Yes, sort of.

8 Q. And how long has that been?

9 A. Oh, I guess, a month or two.

10 Q. And is it fulfilling to you?

11 A. In a sense, yes, in a sense.

12 Q. Would you say you are in love?

13 A. I guess.

14 Q. And do you have any plans or ambitions
15 to live together? We won't send any
16 transcripts to your sweetheart, so you can
17 speak freely.

18 A. You know, when you say, "you," you are
19 talking about Gerald Armstrong, right, you are
20 not asking about her plans?

21 Q. Right.

22 A. Oh, yes, I would marry her in an
23 instant.

24 Q. Do you think that she
will come through?

1 A. I doubt it, my life is a little fucked
2 up.

3 Q. But right now it is going well?

4 A. My life?

5 Q. No. Right now your relationship with
6 this woman is going well?

7 A. Well, it is what it is. I wouldn't
8 say it is going well, because I have this
9 monster that kind of hangs around my neck, but
10 it is what it is.

11 Q. And what's her name?

12 A. What's her name?

13 Q. Yes.

14 A. That's what I call her.

15 Q. Look, I asked that, because I think
16 she's a potential witness.

17 A. Look, I will give you a potential name,
18 Jezebel.

19 Q. And that is not her real name?

20 A. No.

21 Q. Can you give us her real name and
22 address?

23 A. No.

24 MR. TABB: If it becomes necessary and

1 you wish to depose her, we will take that up at
2 that time.

3 MR. BLUMENSON: Okay. So we will
4 stipulate that if we want to depose her we --

5 MR. TABB: We will know who you are
6 talking about.

7 MR. BLUMENSON: And we will move in
8 court.

9 MR. TABB: You will move in court,
10 exactly. MR. GELLAR: We will
11 move to take the deposition of Jezebel.

12 MR. TABB: Right. We will discuss it
13 and if you are permitted to do so, we will
14 produce her.

15 Q. You have had love affairs between your --

16 A. Love affairs?

17 Q. Well, you are in love with this woman,
18 we've established that?

19 A. Yes.

20 Q. And you would count this as a love
21 affair, right?

22 A. Well, I'm not sure.

23 Q. I know it's young.

24 A. It's young, yes.

1 Q. But it would count as a love affair?

2 A. I think so.

3 Q. And what about between your separation
4 from Jocelyn and the present, did you have
5 other love affairs?

6 A. Yes. Different from this one, but,
7 yes.

8 Q. All right. How many?

9 A. How many love affairs?

10 Q. Yes.

11 MR. TABB: This is your chance to
12 prove you have no problems with women, Gerry?

13 A. No. I mean, you are talking about --
14 you will include everything a blanket umbrella,
15 okay? You mean, everything, right?

16 Q. Yes.

17 A. Regardless of time, regardless of --

18 Q. Just where you would categorize it as
19 a love affair.

20 A. Well, I'm real easy, you see, because
21 I write love stories as a living, it's my
22 profession, so I would say --

23 Q. So how many since you separated from
24 Jocelyn can you give me your best estimate as

1 to how many love affairs you have had?

2 A. Five, lets say, five.

3 Q. And what was the longest one?

4 A. Some months, you know, some months.

5 Q. And was that in Boston or elsewhere?

6 A. Elsewhere.

7 Q. Where?

8 A. You guys, I guess, Oregon.

9 Q. What was the name of this person?

10 A. You already know it, but you don't get
11 it.

12 MR. BLUMENSON: So we have the same
13 stipulation that we did before?

14 MR. TABB: Yes.

15 MR. GELLAR: Does this woman live in
16 Florida?

17 THE WITNESS: Yes, she
18 does.

19 (Discussion off the record)

20 Q. Why did that end? Who left whom in
21 that relationship?

22 A. Well, I set sail for Boston sometime,
23 you know. What else do you need to know?

24 Q. So you left?

25 A. Yes. I mean, I really had no choice,

1 you know, and it was just --

2 Q. Why do you think you had no choice but
3 to move to Boston?

4 A. It couldn't be.

5 Q. And why was that?

6 A. Because I arrived at a point where I
7 could not see any other option. After
8 Christopherson, I was destroyed. I was a wreck,
9 I was -- for months and months, a long, long
10 time.

11 Q. What would you say was your most
12 paranoid and the worst period after you got out
13 of scientology?

14 A. The most intense sort of --

15 Q. The time you were least happy and most
16 mentally distressed?

17 A. I guess, when the Dan Sherman video
18 tape thing, that week segment.

19 Q. And what period of time was that?

20 A. April '85.

21 Q. Did you seek any psychiatric or
22 counseling aid at that time?

23 A. No.

24 Q. Have you sought any counseling or

1 psychiatric help since you left the Church?

2 A. Well, I guess, the only thing which
3 comes close to it all is, well, what you have
4 got from Jim Dincalci.

5 Q. He is the only counselor that you have
6 seen?

7 A. Yes. That is the only other person
8 that I have talked to, yes. I talked to
9 Margaret Singer but, you know, she was looking
10 for background information, I guess, and I sort
11 of laid down whatever I laid down, and she did
12 not offer any suggestion -- of course, Dincalci
13 really didn't either, I don't think. But
14 Dincalci's was the only time when, you know,
15 aside from my own struggling with this whole
16 subject, which is a full-time occupation by
17 myself, I haven't talked to anyone else in the
18 hopes of getting any kind of therapy.

19 Q. So you are saying --

20 A. You know, in a large part that is -- I
21 would, I mean, there are a number of factors.
22 I don't have any money, so I can't --

23 Q. I haven't asked you about the factors.
24 I just asked you whether you sought, since

1 leaving the Church, any counseling or
2 psychiatric assistance. And you said the only
3 person from you whom you sought it was Jim
4 Dincalci; is that right?

5 A. Yes. Well, to bring that back, you
6 are talking about psychiatric, so that it will
7 fit into your --

8 Q. Or counseling or therapeutic or
9 whatever or any mental --

10 A. That's the only -- you have got it,
11 that's Dincalci right there.

12 Q. And when you talked with Margaret
13 Singer that was for her purposes and
14 information about cults?

15 A. It's not -- no.

16 Q. I thought you said it was for her
17 purpose to acquire background?

18 A. Relative to Gerald Armstrong.

19 Q. Who approached whom, between you and
20 Singer? Did she come to you, or did you go to
21 her, or did someone else range that you talk?

22 A. I'm trying to think. I talked to her --
23 my recollection is that the sequence went like
24 this: sometime in perhaps 1982, '83, Julia

1 contacts Margaret Singer. Sometime thereafter,
2 let's say '84, I talked to her or corresponded
3 with her, I think I sent her some background
4 information that I had. Then I met
5 her up at Christopherson. She was up there for
6 a couple of days, and I talked to her briefly;
7 there were various other people around. We
8 never really went into the psyche of Gerald
9 Armstrong.

10 Then in, you know, having something to
11 do with this case, I saw her two days for maybe
12 a couple of hours each day in the summer or
13 August of 1985.

14 Q. So the idea that you see her was your
15 attorney's idea, then, who was Julia Dragojevic?

16 A. Yes. I think, Julia may have come up
17 the name. I may have known the name. I don't
18 know.

19 Q. But it was for the purpose
20 of having an expert witness at trial, was that
21 the purpose?

22 A. I think that was the
23 intent.

24 Q. And in your letter to Margaret Singer,
do you recall asking her for books, which would
outline the expected results of being in a so

1 called "cult" for 13 years?

2 A. Oh, I may have. I remember I was very --
3 let me see, 1984? Oh, maybe, a typed letter,
4 maybe. So I don't know. Do you have the
5 letter? I think that would be fair.

6 Q. I have seen it. I don't have it here
7 right now.

8 A. If you haven't got it here right now --

9 Q. I will bring it tomorrow.

10 A. Yes.

11 Q. But I do want to ask whether --

12 A. Then I would hesitate. It seems to me
13 that a lot of my -- the concern that I have had
14 and that I had, and I think it is borne out in
15 the way my life has gone, was that aside from
16 the cultic aspects, you know, because in a way
17 there was certainly a time early 1982, where I
18 was willing to chalk it up as kind of, like, an
19 experience, it was, like, a lot of years, a lot
20 of wasted years, but it was live and let live.
21 Thereafter, the whole thing kind of got
22 transformed by --

23 MR. BLUMENSON: I want to move to
24 strike that, simply because --

1 A. Well, I am trying to explain, because
2 I believe you may have misstated what I wrote.
3 And I had my recollection is that I had a
4 concern about this warfare. You know, how long
5 in this civilized society, where it's like this
6 continual awareness, of you don't know where
7 you are next going to be set up, you don't know
8 where the next -- who you can trust how long,
9 what is the down sides of that?

10 MR. BLUMENSON: All right. I am going
11 to move to strike it as non-responsive, which I
12 would legally have to do.

13 Q. My question was simply: do you recall
14 asking Margaret Singer for books you could read,
15 which would list the expected results of
16 someone being in a so-called "cult" for many
17 years?

18 A. I may have, but I believe I also, or
19 if not, asked this. It seems to me that I
20 asked --

21 Q. Did you ever obtain some books through
22 Margaret Singer or on her recommendation that
23 listed the expected results of being in a cult?

24 A. Well, I believe it went like this: I

1 wrote to Margaret Singer, or maybe Julia did,
2 but in any case, in the meantime -- I believe
3 there was a meantime -- I obtained something
4 that she had written, a paper. From that paper,
5 I obtained titles. And I am pretty sure one or
6 more of those titles I picked up a "Robert J.
7 Lifton."

8 Q. You have read his book about cults?

9 A. I think parts, or I looked at it. I
10 never went through the whole thing. So I think
11 that is the sequence of how it went.

12 Q. Okay. Are there any other books,
13 which you obtained concerning the expected
14 results of being in a cult?

15 A. There are a few that I read, which,
16 you know, in the deprogramming process, which I
17 personally went through.

18 Q. Did you have a deprogrammer?

19 A. Yes. The very finest.

20 Q. Who?

21 A. Gerald Armstrong.

22 Q. Okay. And you went through various
23 books that told you what the expected results
24 of being in a cult are, and then you

1 deprogramed yourself?

2 A. No, no. In fact, I have not found
3 anything other than my own doing this, shall we
4 say, which is, you know, been really that
5 effect. I think what, you know, everything
6 probably that you read has some impact or
7 something, right? It is all dated, it is all
8 coming in, it's all stimuli.

9 So it is all part of whatever results
10 in whatever there is now, but, you know, the
11 real case cracking activities of this whole
12 thing, I think, I worked my own struggling with
13 it.

14 So I have gained perhaps some
15 intellectual understanding of it, of the whole
16 thing. I don't think there have been any
17 revelations about it, perhaps a validation of
18 whatever I have come to.

19 Q. Do you have any people that you
20 consider to have been close friends when you
21 were in high school or, let's say, the first
22 year of college, when you were in University of
23 British Columbia, did you have any people that
24 you considered close friends there?

1 A. You mean at U.B.C.?

2 Q. Yes.

3 A. I guess there was a guy I hung around
4 with by the name of Bob Kipp, and there is
5 another guy -- and I am trying to think of his
6 name, he has one of those faces. I know I know
7 his face and it just eludes me.

8 Q. Do you know where Bob Kipp is?

9 A. No.

10 Q. Do you know what province he is in --

11 A. No.

12 Q. -- or town?

13 A. No.

14 Q. Other than these two people, did you
15 have any other close friends in the 1968, '69
16 period?

17 A. Yes, I think so.

18 Q. Who would they be?

19 A. Maybe girlfriends.

20 Q. Did you have love affairs?

21 A. '68 and '69?

22 Q. Yes.

23 A. Yes.

24 Q. What did you mean when you said you

1 had difficulty with girls in your
2 pre-scientology days?

3 A. You know, I had difficulty being with
4 them, communicating with them, understanding
5 them, making love to them, with them.

6 MR. GELLER: What was the last word?

7 THE WITNESS: Them.

8 MR. GELLER: Before that.

9 MR. TABB: Making love to them and
10 with them.

11 THE WITNESS: Yes. However you want
12 it, yes, I guess, making love. It was --

13 Q. You say in this deposition --

14 A. You know, it took a long --

15 Q. You say in the LaVenda Van Schaick
16 case that you don't relate -- that you had
17 difficulty with girls then to your then loss of
18 consortium in 1984; is that what you said?

19 A. No. That is a whole, you know, that
20 is a whole separate item.

21 Q. Okay. Well, do you attribute loss of
22 consortium to the Church of Scientology?

23 A. Oh, yes.

24 Q. And why is that, how did you make the

1 causal connection?

2 A. Well, you know, I was married for
3 Jocelyn, and when -- first of all, it began, I
4 guess, in April, when the photos were taken, it
5 began then, the terror, the staying up all
6 night thing, but when the P.I. thing began, and
7 we were harassed and haunted day and night, and
8 these guys were right outside the window, and
9 we could not shake them, and it was just
10 terrifying. That was it. That was the end.
11 From there on, that was the end of that
12 relationship.

13 Q. Do you mean to say from that point on,
14 among other things, you were impotent?

15 MR. TABB: I don't think he said that.

16 MR. BLUMENSON: I am asking that,
17 because that came up in the LaVenda Van Schaick
18 deposition also.

19 A. Are you sure?

20 Q. I believe so.

21 A. You better check your records.

22 Q. You said, you made a statement off the
23 record of that about a hot date that you had
24 and at 2:30 that afternoon that was going to

1 change that situation?

2 A. The loss of consortium?

3 Q. I can't recall exactly, but anyway was
4 there a problem or not with impotence during
5 this period? I mean, are you claiming any
6 kind of damage due to impotence?

7 A. I don't see any damage in the
8 complaint, but the reality was, thereafter,
9 there was no more love making.

10 Q. And are you saying that that was
11 because of physical incapacity on your part or
12 because of other things?

13 A. Mental incapacity.

14 Q. And at this point, that is not a
15 problem for you?

16 A. At what point?

17 Q. I mean, at this point you have healthy
18 sexual relations with women and love
19 relationships with women?

20 A. You know, I have worked a great deal
21 on the subject, so, I, you know, sometimes
22 struggle with it and, occasionally, the subject
23 of scientology impacts on wharf is going on, so --
24 and when I say, "scientology," I could care

1 less about all of the philosophy and that stuff.
2 When I talk about scientology and, we are
3 talking about the group at the top of the
4 organize who controls it and uses P.I.s and
5 uses the legal system and uses extra legal
6 operations to harass and control, that's what I
7 am talking about. That's what impacts on my
8 life.

9 Q. Okay. I don't want to delve into
10 these highly personal matters if it is
11 unnecessary.

12 A. It is.

13 Q. Okay. It is unnecessary if we can
14 stipulate that your sexual capacity or sex life
15 is not an issue in this case. If we can
16 stipulate to that, I would prefer to steer
17 clear of the whole issue.

18 The only reason I raised it is that
19 there are implications in prior depositions
20 that that is something that you are attributing
21 to scientology, in which case, I would have to
22 go into the whole sexual history. If it is not
23 in the case, let's stipulate that it is out, so
24 I don't have to deal with this thing.

1 A. Well, you know, I will give you almost
2 neither. First of all, it's not in the case in
3 that it is not in the complaint. Secondly, if
4 it comes up, with Jocelyn, certainly, yes, it
5 screwed up our life. It screwed up our
6 marriage.

7 Q. Okay. I am not talking -- let me try
8 to make this as easy for both sides as possible.
9 I am not talking about effects on your inner-personal
10 relations other than your sexual capacity, okay?
11 If we can stipulate that sexual capacity is not
12 in this case and will not be an issue brought
13 up by either sides, I don't have any need to
14 ask any of these questions, but if it is
15 impotence or inability to sexually perform,
16 that is all I am saying.

17 A. I did not intend to bring it up.

18 MR. BLUMENSON: Can we have that
19 stipulation, Michael, and I will leave the
20 subject alone? It is certainly not something I
21 want to pry into.

22 MR. TABB: I cannot stipulate to
23 anything, because I am not counsel of record in
24 this case and it is not my case to try. Let me

1 have a discussion with -- when you say, "sexual
2 capacity," are you talking about physical
3 sexual capacity as opposed to -- MR.

4 BLUMENSON: Both, I mean, I am saying it is
5 very hard to separate. I am not saying well
6 lets eliminate his ability to form
7 relationships or loving relationships. I am
8 saying, if we have a stipulation that the
9 ability to have sexual relations is out of the
10 case, then I don't want to deal with it,
11 because I have considered it a very personal
12 matter, and I don't want to deal with it.

13 MR. TABB: Let me talk to my client
14 alone.

15 THE WITNESS: Lets talk tonight to the
16 attorney on the case.

17 MR. TABB: Lets talk with the attorney
18 on the case.

19 THE WITNESS: And then we can pick it
20 up tomorrow.

21 MR. GELLER: While you are talking to
22 the attorney on the case, who I assume is Julia,

23 THE WITNESS: Michael.

24 MR. GELLER: Michael Flynn?

1 THE WITNESS: Correct.

2 MR. GELLER: Okay. Would you also
3 mention the fact that we still haven't received
4 the notes of Dr. Singer?

5 THE WITNESS: Oh, yes, that's good that
6 you brought that up.

7 MR. GELLER: And we don't feel like we
8 can complete this deposition without those. So
9 do you have something you want to say about
10 that, Mr. Armstrong?

11 THE WITNESS: Yes. And that was on
12 the subject of documents. You guys were
13 supposed to produce to me prior to this
14 deposition all of the documents from the, you
15 know, that you submitted to the district
16 attorney.

17 MR. BLUMENSON: Can we discuss this
18 after the deposition, you know, we don't need
19 to put this on the record. Neither our issue
20 or this issue. Let's discuss it at five
21 o'clock.

22 THE WITNESS: And the video tapes, so
23 how about if you guys get those, and they were
24 supposed to be here on the 20th, and today is

1 the 29th.

2 MR. GELLER: Lets wait until five
3 o'clock, because I am not sure I know what you
4 want. And I do think that some of this has
5 been taken care of.

6 MR. TABB: I am not familiar with the
7 data of the issue, but we will discuss it
8 afterwards.

9 BY MR. BLUMENSON:

10 Q. You know, in one of your
11 interrogatories you said that you may have a
12 permanent disability, it is not known whether
13 it is permanent or not. Do you know what that
14 is referring to?

15 A. Interrogatory in answer to what
16 question?

17 Q. I'm sorry, I don't have it here. But
18 do you have a permanent disability, or do you
19 not have a permanent disability?

20 A. Well, I am just not sure, because all --
21 I am not, you know, we haven't gone through all
22 of time yet.

23 Q. Okay. So what disabilities do you
24 consider may be permanent, can you give me an

1 exhaustive list of them now?

2 A. The terror.

3 Q. Anything else?

4 A. I can't, you know, I can't tell you
5 what's going on inside me, whether or not it's
6 ulcers or liver or kidneys or whatever it is,
7 so I can't give you a medical diagnosis.

8 Q. You think you have some permanent
9 physical disability also?

10 A. It's possible.

11 Q. What would be the manifestation of it?

12 A. A burning inside my torso.

13 Q. You mean, you feel what, like,
14 indigestion?

15 A. No. Like burning.

16 Q. Have you seen a doctor for this?

17 A. Well, I saw a guy in California, it
18 was kinds of a sort of related matter. And he
19 took a body X-ray and there were a couple of
20 spots and I have not, you know --

21 Q. When did you see this doctor?

22 A. In '83, maybe.

23 Q. And did you ever ask him what the
24 spots were?

1 A. He didn't know.

2 Q. Did you ever see any other doctor or
3 have any follow-up on these spots?

4 A. No.

5 Q. Where were those spots located?

6 A. In the torso somewhere.

7 Q. What is the name of that doctor?

8 A. I'm not sure.

9 Q. And did you have that burning
10 sensation in 1983?

11 A. Yes.

12 Q. And did you see him in an office or a
13 hospital?

14 A. An office.

15 Q. And where was that office located?

16 A. Coasta Mesa?

17 Q. And did you pay for this medical visit?

18 A. Yes.

19 Q. By check?

20 A. I don't know.

21 Q. Do you keep your check stubs?

22 A. I don't have any from that time period.

23 Q. Why not?

24 A. Because I don't have them.

1 Q. Where are they?

2 A. I'm not sure.

3 Q. Have you revealed the names of doctors --
4 have you given over this name? Do you know
5 either whether you turned over this name as a
6 doctor of a medical report or turned over a
7 medical report based on it?

8 MR. TABB: There is a believer trying
9 to maintain medical records, if any exist, but
10 I don't know whether Julia has any information
11 about them.

12 MR. BLUMENSON: Okay. May we have a
13 stipulation that this information will be
14 turned over to us?

15 MR. TABB: If we can find it, you can
16 have it, but I don't know if we can find it
17 with any more further information.

18 Q. What did the doctor tell you about
19 these spots?

20 A. He said, they were there.

21 Q. And where you alarmed?

22 A. Well, a little bit.

23 Q. Did he say there was something to
24 worry about or nothing to worry about, or was

1 there any conversation about whether it was
2 significant or not?

3 A. You know, he was a chiropractor, and I
4 needed to see an internist of some sort. I
5 haven't had either the wherewithal or --

6 Q. To see the internist?

7 A. Yes.

8 Q. So since seeing this chiropractor, you
9 haven't gone to any doctor?

10 A. No. I may have -- I saw one doctor.
11 I don't know which is first about the back,
12 about my back.

13 Q. When was that?

14 A. Around the same period.

15 Q. And is this the patch on your back?

16 A. Yes.

17 Q. And what doctor was that?

18 A. I think his name was O'Brien in
19 Newport Beach. He is a skin guy. He did a
20 biopsy.

21 Q. And what find?

22 A. He thought it was stress related.

23 Q. Did he say that to you?

24 A. Yes. He said it was not malignant.

1 Q. Has it gone a way?

2 A. No. But I work on it. I have a new
3 process that I am doing on it.

4 Q. Which is what?

5 A. Consciousness. It's a whole new idea.

6 Q. You are trying to mentally cure it
7 through your mind?

8 A. No, no.

9 Q. What do you mean by "consciousness,"
10 how is consciousness going to cure this patch?

11 A. The theory being that the awareness of
12 it has to be analytical assimulation of some
13 sort.

14 Q. So you are going to cure it through
15 your own consciousness?

16 A. Well, I am having a shot at it. I
17 don't know that I can cure it, but I am playing
18 with the awareness of the -- of the God damn
19 itch on my back.

20 Q. Can you tell us what it looks like,
21 this patch?

22 A. It looks like a brown patch.

23 Q. And how big is it?

24 A. Yea, big (indicating).

1 Q. That is about four inches?

2 A. Something like that. I can't tell you
3 the shape. It is way back there.

4 Q. Would you be willing to let us
5 photograph it tomorrow?

6 A. Photograph it?

7 Q. Yes.

8 MR. TABB: Is this necessary? I
9 assume that at some point you are going to move
10 for a medical physical exam.

11 MR. BLUMENSON: We might as well see
12 if it is getting bigger or smaller or what.

13 MR. GELLER: Why not?

14 THE WITNESS: Why not what?

15 MR. GELLER: Photograph it.

16 MR. TABB: Do you mind if they
17 photograph it?

18 MR. BLUMENSON: We will give you a
19 copy. We will give you a Polaroid of it.

20 THE WITNESS: I don't care. Is it
21 going to be a Polaroid?

22 MR. BLUMENSON: If we can get one, and
23 we will take two pictures.

24 THE WITNESS: Two pictures and they

1 are only Polaroids?

2 MR. GELLER: What do you want? Do you
3 want us to have a professional photographer in?

4 THE WITNESS: How else can you get it
5 into evidence.

6 MR. BLUMENSON: A Polaroid is okay.

7 MR. GELLER: We will take a Polaroid,
8 and we will get it marked into evidence.

9 MR. TABB: No objection, Gerry?

10 THE WITNESS: What are you going to do?
11 I'll wear a hole in my shirt tomorrow.

12 MR. GELLER: We will have you take
13 your shirt off and we will photograph it.

14 THE WITNESS: Just back shots, only
15 the patch nothing else?

16 MR. GELLER: Okay.

17 THE WITNESS: Okay.

18 BY MR. BLUMENSON:

19 Q. Are there any other doctors that you
20 have seen since you left scientology?

21 A. I don't believe so.

22 Q. Now, I think you testified in a
23 deposition that you had frequent physical
24 fights with your father, do you recall that

1 testimony?

2 A. There were physical fights. There
3 were, I mean, there is a time when they become
4 fights. Up to a certain time, you know, there
5 is no match, right. So it is kind of an one
6 way --

7 Q. You mean, when you were smaller?

8 A. Correct. So I am not sure if those
9 were fights, but I certainly was struck by him
10 on a number of occasions.

11 MR. TABB: Let me say, for the record,
12 Mr. Blumenson, that this is not in the outline
13 and you are treading on thin ground.

14 MR. BLUMENSON: Okay. I appreciate
15 the warning.

16 Q. They are not fights, like, you fought,
17 but more like beatings of a child?

18 A. That's closer.

19 Q. This happened on a periodic basis or a
20 regular basis, didn't it?

21 A. I can't give you how many times it
22 happened, but it definitely happened.

23 Q. How young were you when it first
24 started?

1 A. I couldn't tell you.

2 Q. Did this also happen to your siblings,
3 these beatings?

4 A. I think that perhaps to my younger
5 brother a bit. You know, definitely more to me
6 than the others.

7 MR. TABB: For the record, can we have
8 a definition of beatings? It could be a simple
9 spanking or hitting.

10 Q. Well, let me ask this --

11 MR. TABB: This could be meaning it
12 taking him into the pulp, and the way you say
13 the word
14 "beating," it sounds like he was whopping him.
15 So I just want to get that out.

16 Q. Why were you the one who got the most
17 abuse?

18 MR. TABB: I'm going to object.

19 Q. Why were you the one who got the most
20 physical, for a lack of a better word,
21 beatings or strikings?

22 A. Well, sometimes I was kicked,
23 sometimes I was strapped, sometimes I was hit.

24 Q. Why do you think it was you more than

1 the other kids?

2 A. I think, probably, I had a greater
3 problem with illogic and, probably, I was sort
4 of strung on a different wire from some of them
5 at least. I was probably more stubborn.

6 Q. Did this happen as often as daily
7 during any period of time?

8 A. You know, they could have happened,
9 you know, in a row, day after day, but it isn't
10 like every day of the week just get Gerald. It
11 wasn't that kind of a --

12 Q. But it could be several weeks where it
13 was several times during that week?

14 A. It could be.

15 Q. And was this when your father was
16 drinking?

17 A. Well, it probably was in most cases.

18 Q. But sometimes when he was sober?

19 A. I can't -- I have no recollection of
20 how to differentiate at this point between
21 drunk and sober or drinking and sober.

22 Q. Did any of your siblings or your
23 mother intervene ever?

24 A. In different ways they became involved.

1 Sometimes to stop it, because clearly it was an
2 upsetting experience for everyone.

3 MR. TABB: Mr. Blumenson, it is five
4 o'clock. Do you have one or two questions or
5 are we talking about 20 questions?

6 MR. BLUMENSON: How about five minutes,
7 and then I'll stop.

8 MR. TABB: Five minutes, okay.

9 A. Sometimes it was me against a lot of
10 them.

11 Q. You mean, sometimes who else would be
12 involved in fighting with you on the side of
13 your father?

14 A. Well, any one could have been, but
15 generally, when it was with -- if it was with
16 my father, it was probably just with my father.

17 Q. But you say sometimes it was you
18 against many of them?

19 A. Yes. Sometimes there were incidents.

20 Q. Did that include your sister?

21 A. I don't recall ever being struck by my
22 sister or striking my sister or being struck by
23 my brother or striking my brother or either
24 with my mother.

1 Q. What did you mean when you said
2 sometimes it was you against several of them?

3 A. Because there were some incidents
4 where it was real intense, real upsetting, and
5 I was fairly angry and uncontrollable, and I
6 sometimes was not controlled, I fought, and I
7 would leave, and they would try to keep me, and
8 I would leave.

9 Q. Have you got your own opinion as to
10 what these fights, what the long term effects
11 of these fights on who you are today?

12 A. I have. Yes, I have got some opinion.

13 Q. What are they?

14 A. I don't think that, you know, that my
15 childhood, you know, and I am lumping it all in
16 together, including the fights, that I don't
17 think that it was conducive -- I used the word
18 before and I think you repeated it -- guidance.

19 I do not feel that had I had a -- I
20 feel that -- and I don't dwell on it -- but I
21 feel that if I had had a, you know, probably
22 more supportive loving kind of family life when
23 I was real little it all could have been
24 different.

1 It probably was a factor in
2 predisposing me for my life in scientology, in
3 that to come from an abusive situation like
4 that, you know, in the same way that an abused
5 child will often transfer in that way. I
6 certainly became set up for the abuse, which
7 under the organization would dish out.

8 Q. Do you think that the beating or the
9 striking, however you want to characterize them,
10 by your family against you had an effect on
11 your self-esteem or your feelings of self worth?

12 A. Oh, yes, I think that they had
13 probably a lot to do with it in the early days.
14 I think a lot.

15 Q. Did you ever see, did you ever talk
16 with Jim Dincalci or Miss Singer about that
17 problem?

18 A. I believe -- I don't know what I said
19 to Jim Dincalci.

20 MR. TABB: We are taking a position on
21 Dincalci that it is privileged. And with
22 Singer, I'm not sure certain whether we are
23 taking any privilege on that or not right now,
24 but at this point, I will have to say that we

1 may be taking privilege with Singer as well.

2 MR. BLUMENSON: Okay. I will defer it.

3 We will break now.

4 (Whereupon the deposition
5 was concluded at 5:05 p.m.)
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C E R T I F I C A T E

I, GERALD ARMSTRONG, do hereby certify that
I have read the foregoing transcript of my
testimony, and further certify that said
transcript is a true and accurate record of
said testimony.

Dated at _____, this ____ day of
_____,
1986.

Sworn and subscribed to before me this ____
day of _____, 1986.

Notary Public

My Commission expires:

1 COMMONWEALTH OF MASSACHUSETTS)

2 SUFFOLK, SS.)

3 I, Ruth Day-Rabadjija, Certified Shorthand
4 Reporter and Notary Public in and for the
5 Commonwealth of Massachusetts, do hereby
6 certify that there came before me on the 29th
7 day of Oct., 1986, at 10:15 a.m., the person
8 hereinbefore named, who was by me duly sworn to
9 testify to the truth and nothing but the truth
10 of his knowledge touching and concerning the
11 matters in controversy in this cause; that he
12 was thereupon examined upon his oath, and his
13 examination reduced to typewriting under my
14 direction; and that the deposition is a true
15 record of the testimony given by the witness.

16 I further certify that I am neither
17 attorney for, nor related to or employed by,
18 any attorney or counsel employed by the parties
19 hereto or financially interested in the action.

20 In witness whereof, I have hereunto set my
21 hand and affixed my notarial seal 11/9/86.

22 _____
23 Notary Public

24 My commission expires 8/22/91